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**LOCALLY-LED ADAPTATION SINGLE COUNTRY PROPOSAL FOR
COOK ISLANDS**



ADAPTATION FUND

ADAPTATION FUND BOARD SECRETARIAT
TECHNICAL REVIEW OF PROJECT PROPOSAL FOR
"INCREASING THE RESILIENCE OF DISADVANTAGED COMMUNITIES IN THE COOK
ISLANDS"

Project Title Increasing the Resilience of Disadvantaged Communities in the Cook Islands

Project ID AF00000586

Category LLA

Type Single country project

Stage Fully-developed project

Country Cook Islands

Implementing Entity MFEM

Financing Requested USD 4,999,500.00

Reviewer Linda Ogallo

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Secretariat's Overall Comment

The project Increasing the Resilience of Disadvantaged Communities in the Cook Islands aims to increase the resilience of families in the Pa Enua and of disadvantaged communities in the Cook Islands by adopting a locally-led approach that empowers island communities to lead climate adaptation.

The initial technical review raised several issues, such as the adaptation rationale, enabling devolving decision making to the lowest appropriate level, the full cost of adaptation reasoning, the cost effectiveness of the project, and the treatment of unidentified sub-projects, as is discussed in the number of Clarification Requests (CRs) and Corrective Action Requests (CARs) raised in the review.

Country Eligibility

Is the country party to the Kyoto Protocol?

Response: Yes

Secretariat: The Cook Islands is a party to the Kyoto Protocol.

Is the country a developing country particularly vulnerable to the adverse effects of climate change?

Response: Yes

Secretariat: The Cook Islands is classified by the United Nations as a Small Island Developing State (SIDS).

Project Eligibility

Has the designated government authority for the Adaptation Fund endorsed the project/programme?

Response: Yes

Secretariat: In a letter dated July 23, 2026.

Does the length of the proposal amount to no more than one hundred(100) pages for the fully-developed project document, and one hundred(100) pages for its annexes?

Response: Cleared

Secretariat: The proposal is 100 pages including annexes.

Does the project / programme support concrete adaptation actions to assist the country and/or the local actors in addressing adaptive capacity to the adverse effects of climate change and build in climate resilience?

Response: Not Cleared

Secretariat: The work scope is physical, locatable and countable, the target group is credibly defined and evidenced (Table 3, p.13; Table 16, p.49; two site-verified case studies, pp.22–24), and 430 dwellings across eleven Pa Enua islands is a measurable deliverable. What is not yet demonstrated is that these are adaptation actions rather than housing improvements. The hazard-to-intervention logic is asserted rather than established, and no adaptation performance standard is set for any element of the work scope.

CAR 1: Table 6 (p.21) does not hold up as a hazard-to-intervention logic. "Increasing daytime temperatures, more heatwaves" is mapped to "internalising toilet"; "longer drought periods" to "accessibility through ramps and supports"; and "more severe cyclones and storm events" to "internalising bathroom". Two hazard rows are duplicated without distinction between them. Part III-A (p.49) states the scope derives from the MIA survey, but three of the six items (roof tie-downs, windows and shutters, accessibility) do not appear among the needs recorded in Table 16 (p.49), where the identified needs are water tanks, septic, roof and bathroom facilities only.

Please provide a revised Table 6 in which each work-scope item is traced to a specific projected hazard from the Cook Islands climate section (p.12), and state explicitly which items derive from the survey, which from the site visits, and which from technical assessment.

CAR 2: Kindly clarify the following on the outputs:

1. Building Code 2019 design wind speed is based on a Category Three cyclone (p.10), while the proposal's own projections (p.12) are for increased cyclone intensity. Justify why renovations built to this standard will remain adequate over the asset life, or specify an enhanced standard.
2. BC 2019 minimum floor levels for flooding and coastal inundation are cited (p.10) but floor raising is not in the work scope. State how dwellings below minimum floor level in inundation-exposed locations will be treated.
3. Re-roofing is presented as the response to heat and heatwaves (Table 6), but the scope contains no insulation, reflective or high-albedo roofing, ventilation or shading. Like-for-like corrugated iron replacement will not reduce indoor heat load and may worsen it. Specify the heat-adaptation content of the re-roofing specification.
4. Water tanks are the single most-requested item (51.5%, Table 16) and the Northern Group is almost entirely dependent on roof catchment (Table 2, p.9), yet no tank volume, catchment area or days-of-storage target is set against projected drought duration.
5. Septic tank repair is offered as the response to sea-level rise without addressing rising water tables and reduced system performance on atolls, where repair of a conventional system may not constitute adaptation.

CR 1: Where the assessed scope for a dwelling exceeds the assistance available, the proposal does not say which of the six items takes precedence or who decides. Since this determines the resilience actually delivered per household, clarify the prioritisation criteria, whether they are climate-risk based, and whether the Island

Government, the building inspector or the household makes that call.

CR 2: Component One is the project's only adaptive-capacity output, yet it comprises two workshop days per island for Activity 1.1 and two for Activity 1.2 (p.19; Budget Note C, p.71), delivered once at the start of a seven-year project, with no refresher and no institutional strengthening of Island Government systems for appraisal, record-keeping or monitoring. Clarify how a single round of workshops delivered largely by visiting Rarotonga-based staff is expected to produce a durable shift in local capability, and what happens to that capability between the workshops in 2027 and project closure in 2034.

Does the project/programme enable devolving decision making to the lowest appropriate level? Does it give local institutions and communities more direct access to finance and decision-making power over how adaptation actions are defined, prioritized, designed, implemented; how progress is monitored and how success is evaluated.

Response: Not Cleared

Secretariat: The proposal has real LLA foundations: a seven-year horizon, a resident Climate Change Focal Point on each island, Island Government involvement in application review and island-level scheduling (p.54), household sign-off on completion (p.54), and a design that responds directly to the PEARL terminal evaluation recommendation to extend grants to individual households (p.35). But devolution is concentrated at one point in the cycle, eligibility screening and scheduling, and is thin at the others. Adaptation actions are defined nationally (the six-item work scope, p.21 and p.49) and prioritized against nationally set criteria (Table 17, p.51), and finance is held and disbursed nationally. What the proposal describes as devolution is, across most of the cycle, structured participation.

CAR 3: Page 43 states that "decision-making will be at the local Island Government level and families are directly accessing the available climate finance." Neither holds as designed. Figure 11 (p.51) shows the Island Government making a recommendation, with the PMU as "the final step in evaluation" and able to direct an IG to vary its decision; an applicant refused by their IG appeals upward to the PMU in Rarotonga, so the island body can be overruled and there is no local or independent review point. On finance, funds are held by DCD, transferred to a centrally managed operational account, procured through central CIG processes overseen by the Rarotonga-based PMU, and p.58 states that "a family will not handle any money or make any payments." Households select from a fixed menu against nationally set eligibility criteria.

Please revise to ensure that the project gives decision-making power to the lowest governance levels in the sense intended by Principle 1, and align the LLA claims on p.43 and in Table 26 with what the project actually devolves.

CAR 4: The list on p.43 omits Principle 5 (building a robust understanding of climate risk and uncertainty) entirely, and the answer given for Principle 3 (patient and predictable funding) restates Principle 4 by describing capacity building rather than access modality or funding predictability. Substantively, the risk framing rests solely on CSIRO/SPREP downscaled projections (pp.10–12); no traditional, Indigenous or generational knowledge informs the identification of hazards, the selection of the work scope, or the assessment of which dwellings are most exposed, despite the ESP screening confirming that Cook Islanders are Indigenous and were consulted (p.48).

Kindly expand the treatment of Principle 5 so that it reflects how climate risk is actually understood at island level. One avenue worth considering is the dwelling assessment under Activity 2.1, where local and generational knowledge of cyclone exposure, inundation, drought and water security on each island could sit alongside the

scientific projections in determining which dwellings are most exposed and what work each one needs. It would also help to revisit the response to Principle 3, which as drafted speaks to capacity rather than to how straightforward and predictable access is for local actors.

CR 3: Disclosure described in the proposal runs to the CCCI website and social media (p.37), which is national and upward-facing. Please clarify what will be published at island level: applicant and approval lists, the allocation received per household, and expenditure per island, noting that per-island cost centres already exist in the FMIS (p.72) and would make the latter straightforward. Please further clarify how the proponent sees the Grievance Redress Mechanism (p.63, Annex Five) operating alongside the eligibility review route in Figure 11, given that both appear to sit within the CCCI/MFEM chain that makes the funding decisions. Kindly consider whether some degree of separation between the two, or an element of independence in how grievances are received and resolved, would strengthen accountability to households at island level.

Does the project / programme provide economic, social and environmental benefits, particularly to vulnerable communities, including gender considerations, while avoiding or mitigating negative impacts, in compliance with the Environmental and Social Policy and Gender Policy of the Fund? Does the project/programme address structural inequalities faced by women, youth, children, people with disabilities, people who are displaced, Indigenous Peoples and marginalized ethnic groups?

Response: Not Cleared

Secretariat: The economic case is specific and credible: households on fixed incomes cannot take on debt, and commercial banks will not lend to a person over 60 without a co-signor under 60 (p.22), so a grant modality is the right instrument. Social and environmental benefits are plausibly reasoned around family cohesion, reduced out-migration and reduced post-cyclone damage (p.24), and the two case studies ground these in observed conditions. The gender assessment draws on real evidence, identifies elderly women and returnees as particularly exposed, incorporates PEARL lessons, and establishes a costed GAP with a survivor support partnership (PTI). The difficulty is in how it converts into design.

The GAP is a women's action plan. Youth, children, people with disabilities, displaced people and Indigenous Peoples are named but not analysed, and no measures attach to them.

CAR 5: Page 25 identifies only two potential negative impacts, disruption to families during renovations and the waste stream. Two further impacts follow directly from the beneficiary profile and the delivery model but are not considered. First, temporary relocation: the target group is defined partly by being over 60, having a disability or mobility limitation, or having health issues (p.13), and p.63 assumes families "will have time to make arrangements for a temporary move if required," which on islands of a few hundred people with no alternative accommodation is a significant burden on precisely the households least able to absorb it. Where occupants remain in the dwelling during works, their exposure to dust, noise and open structure during re-roofing is also unaddressed. Second, labour influx: the design allows on-island work gangs to be supplemented from Rarotonga (p.43), introducing outside crews into small communities over a seven-year period.

Kindly assess both risks, and include what accommodation, respite or sequencing arrangements would allow elderly and disabled occupants to remain safely housed while their homes are being worked on.

CAR 6: Page 48 states that "it is unlikely that builders will be exposed to hazardous materials, but training on this will be part of the upskilling to be conducted under the EDA." Eligibility restricts the project to dwellings built before 2019 (Table 17, p.51), and the Aitutaki case study describes fibrolite walls (p.22). Asbestos cement sheeting and lead paint were both common in Pacific housing of that vintage, and re-roofing, window

replacement and demolition are precisely the activities that disturb them. The risk falls on occupants as well as workers, and many occupants are elderly or in poor health.

Please provide the evidence on which the conclusion that exposure is unlikely was reached, including whether the housing stock has been surveyed for asbestos-containing materials and lead paint. Please also confirm whether hazardous materials screening will form part of the building inspector's assessment of each dwelling before works commence, and set out the controls that will apply where such materials are identified, covering safe removal, occupant protection during works, disposal, and the competence and equipment required of the work teams.

CAR7 : Three issues stand out not the gender considerations:

1. Page 63 and the GAP both state the aim of "ensuring decision-making criteria are gender blind." Gender-blind means the criteria take no account of gender at all. The AF Gender Policy asks for something different: criteria that recognise women and men start from different positions and are designed to close that gap. The proposal's own evidence shows the gap exists, recording average annual income at \$20,209 for males and \$18,348 for females (p.63), alongside findings that women in the Pa Enua face greater equality issues than women in Rarotonga and that elderly women and returnees are among the most exposed. Applying identical criteria to households in unequal positions will tend to preserve that inequality rather than reduce it.

2. The target attached to that activity does not measure gender equity. In GAP Table 6.1, the activity on gender-blind decision-making criteria is paired with the target "zero IG decisions overturned by PMU by project completion." Whether the PMU overturns an Island Government decision tells us nothing about whether women and men were treated equitably. It also sets up the wrong incentive: if a decision were made on discriminatory grounds, the PMU overturning it is the correct outcome, but under this target that would be recorded as a failure.

3. The participation targets look low against what the project has already observed. Women were 275 of the 523 people consulted (p.39) and completed 52.8% of the MIA survey responses. Against that, targets of 30 women participating in agency workshops by mid-term and 200 women completing applications out of 430 households appear to be below current levels of women's engagement rather than an advance on them.

Please describe the criteria as gender-responsive and set out how the proposal accounts for differential vulnerability. Kindly also replace the target of zero Island Government decisions being overturned by the PMU with one that measures equitable access or outcomes for women applicants, and revisiting whether the participation targets reflect the level of engagement women in the Pa Enua are already demonstrating.

CAR 8: Disability is one of the four defining characteristics of "disadvantaged" in this project (p.13) and accessibility works are in the scope, yet people with disabilities appear once in the assessment as a category of person, with no analysis, no indicator, no target and no measure addressing accessibility of the participation process itself, including how someone with mobility or mental health issues attends an island workshop or completes an application. Youth are not analysed and Table 17 (p.51) sets a 21-year minimum. Children are not analysed despite child-related benefits being claimed. Displaced people are not analysed despite the proposal's own treatment of out-migration and returnees (pp.6–7), and the assessment identifies elderly returnees as particularly vulnerable without carrying that into the design. Indigenous Peoples receive a single paragraph confirming that Pa Enua families are Indigenous and were consulted (p.48), with no consideration of customary tenure, traditional authority or knowledge.

Given that Principle 2 and the ESP both name these groups explicitly, please broaden the proposal to include beyond gender, or at minimum to state clearly which groups have been assessed and why the others fall outside scope.

Is the project / programme cost effective?

Response:

Not Cleared

Secretariat: The complementarity argument (pp.25–26) is the strongest part of this section and it is specific rather than generic: one application form and one review process per household, one inspection serving two funding streams, one Island Government evaluation covering a single combined scope of work, grouped procurement and shipping by island, coordinated scheduling of the island labour pool, and avoided inspector training costs because the upskilling sits with the EDA. These are real efficiencies and they are the right ones to claim. The grant modality is also well justified over lending, given that banks will not lend to a person over 60 without a co-signor under 60 (p.22). Execution cost at 2.9% and project cycle management at 6.6% are both low.

CAR 9: Page 26 states that "the only alternative would be for the DCCI project to be implemented as a stand-alone project." That compares two management arrangements for the same intervention; it does not compare intervention choices. Several alternatives are available on the proposal's own evidence and are not examined. The most significant is the allocation trade-off: the project spreads assistance across 430 households at a level that is below full Building Code compliance, and the alternative of bringing a smaller number of the most exposed dwellings to full compliance is never weighed against it. Others include whether some communal assets, such as shared water storage or a strengthened community building serving as a cyclone refuge, would deliver more resilience per dollar in the smaller Northern Group settlements than individual household works, and whether the worst-condition dwellings are more cost-effectively rebuilt than retrofitted. The stand-alone option that is named is also not costed, so even that comparison rests on assertion.

Please include a clear description of alternative options and a comparison with indicative costs and expected resilience outcomes, and explaining why the chosen approach represents the better value. Kindly also cost the stand-alone option so the complementarity saving can be seen rather than inferred.

CAR 10: Three claims carry this section and none can be verified as presented. First, grouped procurement is said to enable "discounted pricing for bulk purchases and shipping," increasing purchasing power and the scope of work per household (p.26), but no comparator price, discount rate or quantified saving is given. Second, building materials at US\$3,681,000, which is 74% of the total budget, appear as a single lumpsum line (Note H, p.71) with no unit cost by work-scope item and no differentiation between islands, even though the proposal's own travel costs show a roughly tenfold difference between the Southern and Northern Groups (US\$700 against US\$7,500 per return trip, Notes D and E). Without unit costs there is no basis on which value for money can be assessed. Third, the statement on p.70 that "over 90% of the budget is going directly to implementing project activities" holds only because staffing sits inside the activity lines: US\$336,000 of Project Manager salary distributed across Activities 1.1, 1.2, 2.3 and 2.4 (Note A), and US\$280,000 of Focal Point costs (Note O). The effect is most visible in Component One, where US\$192,000 of the US\$298,500 total is Project Manager salary, leaving approximately US\$106,500 for all workshops, travel, per diems and accommodation across eleven islands over seven years.

Please provide indicative unit costs by work-scope item and by island group, with the assumed procurement saving quantified against a comparator. Kindly also consider restating the 90% figure in a way that distinguishes staffing from delivery, and explaining how Component One represents good value on the residual figure.

CR 4: Page 41 records that in FY2024/25 the Special Assistance Fund spent NZ\$156,250 on house improvements across 20 completed applications, inclusive of freight and labour. That is a directly relevant comparator for a project delivering the same type of work to the same population, and the EDA's own Tier One per-household cost and the completed SRIC-CC and PEARL projects offer others. Kindly clarify the DCCI's cost per household

and per beneficiary compared against one or more of these, with an explanation of what accounts for the difference.

Is the project / programme consistent with national, sub-national or local sustainable development strategies, national, sub-national or local development plans, poverty reduction strategies, national communications and adaptation programs of action and other relevant instruments?

Response: Not Cleared

Secretariat: Part II-D (pp.27–29) establishes credible alignment with the National Sustainable Development Agenda 2021–2121, the Economic Development Strategy 2030 and the Cook Islands Climate Change Policy 2018–28, and Part II-E (pp.29–31) sets out the technical and procurement instruments the project will work within, including the Building Code 2019 and the CIG Purchase and Sale of Goods and Services Policy. The quotation from the Climate Change Policy on differential impacts across sectors of society (p.29) is well chosen and directly supports the project's targeting rationale.

CAR 11: This section addresses national policy only. No Island Development Plan, island strategic plan, Island Government work programme or local budget process appears anywhere in the section, and none is referenced elsewhere in the proposal as a document the project aligns with or contributes to. This matters because Component One is built on strengthening Island Government capability to manage adaptation, Island Governments are the body that receives and assesses applications, and the LLA claim rests on decisions being taken at island level. A project of this design should ideally show how the works on each island sit within that island's own plan and priorities. The one local instrument the proposal does mention, the island disaster response plans maintained by EMCI (p.37), appears only as something the project will feed data into rather than as a plan the project aligns with, even though those plans identify residents needing assistance to evacuate, which overlaps directly with the beneficiary group.

Please identify the island-level planning instruments that exist for the Pa Enua and setting out how the DCCI aligns with them, and kindly consider whether the island disaster response plans could be treated as an alignment point rather than only a recipient of project data.

CAR 12: The criterion names national communications and adaptation programmes of action specifically. The Cook Islands Third National Communication is cited once in the proposal, in footnote 1 on p.4, and only for a fact about the administrative centre and the EEZ; nothing from its adaptation content is used. The Nationally Determined Contribution appears only in the acronym list and is never referred to in the text, so the adaptation priorities the Cook Islands has communicated to the UNFCCC are not shown to support this project. No national adaptation planning instrument is identified. On poverty reduction, the project is in substance a targeted social assistance measure delivered through climate finance, resting on the MIA register of socio-economically vulnerable families and operating alongside the Special Assistance Fund, and the Economic Development Strategy action on an effective welfare system is quoted at p.28; yet no social protection policy, welfare policy or poverty reduction strategy is named, and the relationship between the DCCI and the SAF as a continuing national instrument is set out at p.41 in funding terms rather than as a policy alignment.

Please draw on the adaptation priorities in the Third National Communication and the NDC to show that this intervention is among those the country has already identified, and kindly also name the social protection or welfare instrument the project's targeting operates within.

CR 5: Table 8 (pp.27–28) maps six of the fifteen NSDA goals to project activities, but four of the six rows describe the contribution only as "all the house renovations," and none of the NSDA's 72 indicators is cited, so the

contribution is not measurable. The Climate Change Policy alignment similarly quotes a guiding principle rather than identifying which policy actions the project delivers. On currency, p.27 notes that the first NSDA five-year plan has just finished for 2021–2025, so a project starting in 2027 would sit within the subsequent five-year plan, which is not referenced; and the National Policy on Gender Equality and Women's Empowerment, relied on at p.29 and in the Gender Assessment, covers 2019–2024.

Kindly show the alignment expressed against specific NSDA indicators and against the current planning cycle, with a note on whether successor instruments to the gender policy are in place.

CR 6: Page 30 sets out a three-stage consent process involving an Environmental Significance Declaration to the National Environment Service, sanitation and sewage design approval from the Ministry of Health, and a building permit from Infrastructure Cook Islands. The proposal does not then say whether the 430 renovations require consent, and if so at what point in the process, who lodges the applications, or how three Rarotonga-based agencies will assess dwellings on eleven islands where none of them has a permanent presence. This bears directly on consistency with national instruments and on the schedule, particularly for septic tank work, which engages the Public Health (Sewage and Wastewater Treatment and Disposal) Regulations 2014.

Please clarify the consent pathway envisaged, including whether any exemption or streamlined process applies to renovations of existing dwellings.

Does the project / programme meet the relevant national technical standards, where applicable, in compliance with the Environmental and Social Policy of the Fund? Does the project provide support to local actors and build their capacities to comply with the standards?

Response: Not Cleared

Secretariat: Part II-E (pp.29–30) names the Building Code 2019 as the governing standard and lists the specific parts the works will meet, covering water supply plumbing, sanitary plumbing and drainage, septic tanks, rainwater harvesting and storage, roofing and roof tie-down, windows and shutters, and pit latrines, along with material standards including fire resistance for timber and walls. The consent pathway and the CIG procurement policy are also set out. Every element of technical capability sits with the EDA. Inspectors are trained under the EDA (p.26), contractor training through CITTI is EDA-funded (p.62), and hazardous materials training is EDA-delivered (p.48). Component One builds capability in application processes and awareness, not in the standards themselves.

The project is a USP programme that has been classified as though it were not.

CAR 13: Page 45 states that "there are no unidentified sub-projects." On the design as described, the 430 dwellings are precisely not identified at the point of approval. They are determined afterwards, through a two-month call for proposals following the Component One workshops (p.50), assistance from the Climate Change Focal Point, assessment by a building inspector, an Island Government recommendation against the criteria in Table 17 (p.51), and PMU endorsement (Figure 11, p.51). Which islands, which households, which of the six work-scope items and which site conditions apply will only be known during implementation. This falls under the definition of USP, and it is also well-suited approach for an LLA project of this kind.

Much of what the USP policy asks for is already present and simply not labelled as such: a defined envelope of US\$3,681,000 for the works, eligibility criteria in Table 17, a documented selection and approval process in Figure 11, a Gender Action Plan, and a Grievance Redress Mechanism. What is missing is the safeguards layer that attaches at the point each dwelling is identified. Specifically, there is no environmental and social management plan setting out how each sub-project will be screened, no risk categorisation procedure for

individual dwellings, no commitment from the Implementing Entity to apply the ESP and Gender Policy to each sub-project once identified, no arrangement for reporting on sub-project screening outcomes, and no demonstration of capacity at executing entity or island level to apply safeguards. On the last point, Table 22 (p.62) assigns monitoring of building waste and septic seepage to the CAM and PM, but neither has a defined safeguards role, no safeguards training is provided within this project, no environmental and social specialist appears in the staffing, and no budget line supports the function.

Please recognise the project as one involving unidentified sub-projects and providing the accompanying ESMP with a dwelling-level screening procedure, together with the IE commitment and reporting arrangements the USP policy requires. Kindly also consider how safeguards capacity will be established at island level, since the screening will in practice be applied by the focal points, inspectors and Island Governments rather than centrally.

CAR 14: The proposal commits the works to Building Code 2019 standards but does not say who determines that a completed renovation meets them. Sign-off is described as the responsibility of trained inspectors (p.54), but those inspectors are trained under the EDA for the purpose of assessing scope and are not identified as holding any authority under the Code, while formal compliance determination sits with Infrastructure Cook Islands. Separately, p.47 states that "at a local government level, compliance will be applied as part of the decision-making by the Island Governments," yet no activity, training or budget in this project equips Island Governments to make a technical compliance judgement, and Component One does not cover the Building Code. Given that the project's own results framework measures dwellings "upgraded to meet building code standard," the certification question determines whether the headline result can be reported at all.

Please set out who certifies compliance for each completed dwelling and on what authority. Kindly also consider whether the capability to comply with and verify the standards should be built within this project rather than relied upon from the EDA, since Component One is where local technical capability would ordinarily be developed.

CR 7: It is unclear who will carry out the renovation work and whether they are qualified under the Building Code regime. The proposal describes the workforce differently in three places. Page 48 states the work will be carried out "in the main by CIG workers," supplemented by private sector contractors. Page 43 refers to on-island work gangs supplemented by extra labour from Rarotonga. Page 62 refers to contractors trained through CITTI "who intend to be a service provider for the EDA and DCCI."

Please clarify which of these is the operating assumption, whether the workforce on each island is expected to be sufficient over a six-year works programme, and whether any licensing, registration or trade qualification is required for work of this type under the Building Code and the Decent Work Country Programme arrangements described at p.48.

Is there duplication of project / programme with other funding sources? Does the project enhance collaboration across sectors and enhance efficiencies and good practice?

Response: Not Cleared

Secretariat: Part II-F (pp.32–34) identifies three related funding sources, describes each with enough specificity to be useful, and states the demarcation between them: the EDA works through the same households, the SAF has its own eligibility rules and five-year re-application window, and the NZ Country Flexible Finance operates at community rather than household level. Table 11 (p.34) sets out comparative per-household values, and the statement that a household drawing on the SAF will not thereby lose DCCI eligibility (p.33) is the right position,

since penalising households for assembling support would undercut the purpose.

Cross-sector collaboration is also present, spanning climate change (CCCI), finance (MFEM), internal affairs (MIA), infrastructure (ICI), health and environment through the consent pathway, tertiary training (CITTI) and a civil society partner (PTI), alongside the eleven Island Governments. The efficiencies claimed from working alongside the EDA are specific and plausible.

However, overlaps with the SAF and the CFF are identified but no control is put in place.

1. On the SAF, p.33 anticipates that households may supplement DCCI and EDA funding, and that others may be inside the five-year re-application window because they have recently received SAF support. Since SAF assistance to outer island residents on a Cook Islands pension can reach NZ\$10,000 and is used for house improvements, the same work item, most obviously a water tank or septic repair, could be funded twice. No mechanism is described to prevent this: no data sharing with MIA on prior SAF awards, no requirement to record SAF contributions in the household file, and no step in the assessment at Figure 11 (p.51) that checks what a household has already received. This is readily addressed, since MIA holds the register from which the beneficiary group is drawn.

2. On the CFF, p.34 acknowledges that "there may be occasions where another island's community chooses an area in common with the DCCI," and the example given is the Mauke community water tank project, water storage being the most requested item in the DCCI at 51.5% of surveyed households. The response offered is that "there will be opportunities to coordinate," which describes a possibility rather than a mechanism, and the CFF is ongoing at up to NZ\$40,000 per community throughout the DCCI period.

CAR 15: Please include a duplication check to the household assessment step to avoid duplication of activities with SAF and CFF. Kindly also consider agreeing a simple information-sharing arrangement with MIA and with the CFF programme so that overlap is detected before approval rather than after.

CR 8: The comparative figures in Table 11 do not reconcile with the surrounding text. Table 11 (p.34) records the SAF at US\$6,000 per household, while the narrative on the preceding page states that outer island residents receiving a Cook Islands pension can receive up to \$10,000 and outer island residents on a foreign pension up to \$5,000. Since the DCCI targets Pa Enua households exclusively, the applicable ceilings are the outer island figures, not \$6,000. The SAF amounts and the NZ\$27,000 income threshold appear to be in New Zealand dollars while the Table 11 column is headed "Value USD," and Table 7 (p.23) uses a further figure of "up to \$6,000." Please ensure the currency is stated explicitly and the figures are aligned across the three places they appear.

CR 9: Page 34 makes the PMU responsible for coordinating the DCCI with the EDA, the SAF, the CFF and any new initiatives emerging over seven years, and names MIA, MFEM, ICI and the Island Governments as the counterparts. Neither the Ministry of Health nor the National Environment Service appears, although both are essential to the consent pathway set out at p.30 and to any septic or sanitation work.

Kindly clarify how coordination across these funding sources will be convened in practice, and whether the existing EDA governance arrangements could serve that purpose rather than establishing a separate structure.

Does the project / programme have a learning and knowledge management component to capture and feedback lessons, in particular managing traditional and/or indigenous knowledge, where relevant? Does it contribute to building and institutionalizing local capacities?

Response: Not Cleared

Secretariat: Knowledge management is shown to have started at design rather than at implementation (p.35): the terminal evaluation of PEARL recommended extending community grants to individual household

applications and highlighted the role of on-island coordinators, and both lessons are visibly carried into the DCCI design as the household-level modality and the Climate Change Focal Points.

The plan to feed project data back into two permanent national systems (p.37), the MIA register of socio-economically vulnerable families and the EMCI database of house characteristics that underpins island disaster response plans and the identification of residents needing evacuation assistance, is genuine institutional legacy.

However, once the previous-lessons discussion and the database updates are set aside, Section G consists of Figure 9 (the reporting flow), a lessons and best practice register held by the Project Manager within PMU records on Rarotonga (p.36), and public information on the CCCI website and social media (p.37). No knowledge product of any kind is identified. No activity or budget line in Table 27 (pp.70–71) corresponds to a knowledge management function, and no staff member is assigned to it beyond the Project Manager's existing load.

The flow back to communities is the weakest part. Island Governments are said to be "included in the learning loops," but what this amounts to is receiving the applications from their own island and being placed on the distribution list for annual reports (p.37), which are formatted to meet AF reporting requirements. The lessons register itself sits in Rarotonga with no stated access arrangement for Island Governments or households. The only public channel is the CCCI website and social media, in a country where the proposal records connectivity in the Northern Group as more tenuous (p.12), and no product is envisaged in Cook Islands Māori or in a format suited to island audiences.

Traditional and Indigenous knowledge is absent from the section entirely, and no provision exists within the knowledge management arrangements to record it, to establish who owns it, or to obtain consent for its use, even though the ESP screening confirms that Pa Enua families are Indigenous (p.48) and hold generational knowledge of cyclone exposure, inundation and water security on their own islands.

CAR 16: Please set out a knowledge management plan with named products, audiences and formats, including at least one product designed for island communities in an accessible language and format and one aimed at national policy. Kindly also consider how lessons will be returned to the islands during implementation rather than only at reporting points, and how traditional knowledge, where communities choose to share it, will be recorded and protected within the project's knowledge systems.

CR 10: The institutional legacy of learning rests on retention rather than on anything left behind. Page 36 states that the experience and knowledge from the Component One workshops "will then be retained in the community to be used in future projects." Retention is passive, and nothing tangible is identified as remaining with the Island Government at closure: no island-level record of which dwellings were assessed and what was done, no template or tool for running a future application round, no local copy of the lessons register. The Focal Point, who will accumulate most of the practical island-level knowledge over seven years, holds a role funded jointly by the DCCI and the EDA, both of which end. Please clarify what system each Island Government holds on the day the project closes, and who on the island is then able to use it.

CR 11: Adaptive management is recognized but it is not clear what can actually be adjusted. Page 36 states that M&E and other information sources will feed into adaptive management, and the informal channels named, verbal communication with islands, island visits and observations from other project staff, are realistic ones. What is not described is the scope for change that this learning could produce. The work scope is fixed at six items, the eligibility criteria in Table 17 are fixed, the materials budget is a single lumpsum, and no rule is given for reallocating between islands or between work-scope items during implementation. Kindly clarify what may be varied in response to what is learned, who decides, and whether Island Governments have any role in initiating a change.

Has a consultative process taken place, and has it involved and encouraged all key stakeholders, and vulnerable groups, to meaningfully participate in and lead adaptation decisions? Did the consultative process consider and address gender-based, economic and other inequalities in compliance with the Environmental and Social Policy and Gender Policy of the Fund?

Response: Not Cleared

Secretariat: The consultation runs across four tiers with communities and local government representation. Site visits to prospective beneficiary homes on Aitutaki and Mitiaro produced the two case studies in Part II-B, which is the right way to ground-truth survey data. p.40 states that discussions with beneficiaries and Island Governments "led to the scope of activity being revised and broadened for the project to include accessibility." Government agency consultation is likewise substantive, with the SAF implementation model adopted as the basis for the DCCI design and the EMCI database informing the vulnerability analysis. Women were 275 of the 523 people consulted, a majority.

CAR 17: The consultation record is incomplete for the islands where needs are greatest, and the headline figure is not explained. Table 12 (p.39) lists eight entries, of which four carry no number consulted: Penrhyn, Manihiki and Rakahanga, Pukapuka and Nassau, and Mangaia. The accompanying text is written in the future tense, noting that Northern Group consultations were delayed to July 2026 and that "the final consultation will be on Mangaia in August 2026." On the record as submitted, the entire Northern Group and Mangaia have not been consulted at island level, and the 523 figure covers four Southern Group islands. This matters because the Northern Group is where water insecurity is most acute, where dependence on roof catchment is near-total, where freight and logistics are hardest, and where the case for the project is strongest. Palmerston has had no community consultation at all, only its Mayor and Executive Officer at the Forum, yet it is counted within the eleven islands in the results framework.

The composition of the 523 also needs expounding. The four island visits recorded in Table 12 total 87 people and the Pa Enua Forum around 40, so the great majority of the figure appears to come from elsewhere. If so, a written survey administered for a different project is being counted alongside face-to-face consultation, which are not equivalent forms of engagement.

Please update Table 12 and the consultation report with the completed Northern Group and Mangaia consultations, including numbers and dates, and setting out how the 523 is composed so that survey responses and consultation attendance can be distinguished. Kindly also include what form of engagement is possible for Palmerston, given it is included as a beneficiary island.

CAR 18: There is no evidence that the target group itself participated, and no gender-responsive design to the consultation. The only disaggregation offered is a single national sex split of 275 women, 247 men and one unassigned. There is no disaggregation by island, no age data, no disability status, and no distinction between categories of participant. The islands meetings are described as involving "the Mayor, Councillors and staff of the Island Government, NGOs and the general community," so it is not possible to tell how many of the 523 were themselves elderly, living alone, disabled, or from low-income households, which are the four characteristics that define the beneficiary group on p.13. For a proposal resting on the LLA principle of vulnerable individuals meaningfully participating in and leading adaptation decisions, this distinction is the substance of the criterion. Nothing in the process is designed around the inequalities the Gender Assessment itself documents. There were no separate or women-only sessions despite the assessment's reliance on findings that one in three women report intimate partner violence, no adjustment for the reality that on islands of a few hundred people women may not speak freely in a mixed public meeting, and no accessibility provision for participants with mobility limitations, who are simultaneously a priority beneficiary category. No gender-differentiated findings emerge from the consultations on matters where they would be expected, such as water collection, sanitation, safety

during works, or who decides on household repairs. It is also notable that across every consultation recorded, no concern, objection or trade-off is documented. The Pa Enua Forum response is described as favourable, and the island meetings as reinforcing awareness.

Please disaggregate the consultation record by island and by participant category, so that participation by the intended beneficiary group is visible. Kindly include if the consultations will include separate sessions for women and for elderly or less mobile participants, and if any concerns raised were documented and how each was or was not accommodated.

CR 12: Traditional leadership is present in the EDA consultations but not in the DCCI's. The consultation report records that the EDA meetings on each island involved traditional leaders alongside community organisations and local government, but the DCCI island consultations are described as meetings with the Mayor, Councillors, Island Government staff, NGOs and the general community, with no mention of Aronga Mana. This is relevant beyond representation: eligibility under Table 17 (p.51) turns on home ownership or a signed memorandum from the owner, and land and dwelling tenure in the Cook Islands runs through customary structures. Please clarify whether traditional leaders were engaged on the DCCI specifically, and whether their role in resolving questions of ownership and consent for works on customary land has been considered in the application process.

Is the requested financing justified on the basis of full cost of adaptation reasoning?

Response: Not Cleared

Secretariat: The full cost of adaptation argument is absent, and the requested amount is not derived from an assessment of adaptation cost. Table 7 (p.23) is the closest the proposal comes, and it answers a different question. It sets out what funding is available from which source, whereas the criterion asks what the adaptation intervention costs and what share of that cost the Fund is being asked to meet. The AF figure of US \$8,100 is annotated "based on 430 households," which derives the per-household amount by dividing the envelope by the beneficiary count rather than building it up from assessed need. There is no bottom-up costing from the six work-scope items, and no statement of what adaptation outcome US\$8,100 purchases.

The gap is also unacknowledged. On the proposal's own figures, full compliance with the Code's climate adaptation components costs approximately US\$28,500 per dwelling, while AF and GCF funding together provide US\$20,623, leaving US\$7,877 per household unfunded. The SAF may cover part of this for some households, but not all, since the five-year re-application window excludes recent recipients and the eligibility rules are narrower than the DCCI's. The proposal does not say what the shortfall means in practice: whether dwellings will be brought to a defined partial standard, which components will go unaddressed, or whether fewer households will receive a fuller scope.

Two further elements are missing. There is no baseline: what these households would or would not do without the project, given the section's own finding that they cannot service debt and that banks will not lend to a person over 60 without a co-signor under 60 (p.22), which is in fact a strong additionality argument waiting to be used. And there is no split between the adaptation increment and the development or amenity component. Roof tie-downs, shutters, spouting and water tanks respond directly to identified hazards; internalising a toilet or bathroom and installing ramps and accessibility supports are humane and were properly added through consultation, but their adaptation increment is not established, and under full cost of adaptation reasoning the proposal should say which financier carries the non-adaptation portion.

CAR 19: Please add a full cost of adaptation section as per the AF template that sets out the baseline, the total adaptation cost of the intervention, the share sought from the Fund and the share carried by others, and a build-

up of the US\$8,100 from the work-scope items rather than from the envelope. Kindly also state plainly what level of Code compliance the combined funding achieves and how the residual is treated.

CAR 20: The financing case rests entirely on the GCF contribution, which is neither secured nor tested. The argument at p.23 that coordination with the EDA increases available funding and thereby expands the scope of renovation is the pivot of the whole financing case. If FP281 does not proceed as assumed, the Fund is being asked to meet US\$8,100 against a stated need of US\$28,500, and the reasoning does not survive.

The dependency runs deeper than the co-financing figure. Costs essential to delivering the AF-funded output sit outside the AF budget: shipping of materials to each island and payment of the work gangs, both confirmed as EDA-borne in Budget Note H (p.71); procurement management; training of the building inspectors who assess and sign off the works (p.26); contractor upskilling through CITTI (p.62); the Contract Activity Manager on each island (Table 19, p.55); part of the Focal Point salaries (Note O, p.72); and the Code of Conduct and SEAH training relied on in the Gender Action Plan. Whether the Fund is being asked for the full cost of the adaptation intervention or for a partial cost premised on another financier carrying the remainder is therefore unresolved.

Against this, the proposal does not state FP281's approval status, effectiveness date or end date, so it cannot be seen whether the EDA will still be operating when the later islands are reached in a project running to 2034. The memorandum of understanding cited at p.32 is between MFEM as GCF Accredited Entity and CCCI for the EDA; no instrument is identified that commits the EDA contributions to this project. In Table 21 (p.60) the only related entry is "GCF Tranche payments delayed," classified low and mitigated by "regular coordination with EDA staff," which addresses timing but not consequence, and there is no entry for the EDA being delayed in starting, reduced in scope, or closing before the DCCI.

Please set out FP281's status and timeline alongside the DCCI schedule, identifying the instrument that secures the EDA contributions to this project, and presenting the AF request against both scenarios: with the co-financing in place, and without it. Kindly also add the loss or reduction of the EDA to the risk register with a mitigation that addresses the consequence rather than the timing.

CR 13: The US\$28,500 benchmark is carried over from another document without examination. The figure at p.23 is sourced to FP281 p.27 and appears to be a single national average for bringing a pre-2019 residential building into compliance with the Code's climate adaptation components. It is used as the denominator of the financing case but is not disaggregated in any way: not by island, although the proposal's own travel costs show roughly a tenfold difference between Southern and Northern Group logistics (Notes D and E, p.71); not by dwelling condition, although the two case studies describe very different starting points; and not by which of the Code's climate adaptation components actually apply to a given house, since not every dwelling needs every item. Kindly clarify how the figure was derived, whether it holds for the Pa Enua specifically, and how it varies across the eleven islands.

Is the project / program aligned with AF's results framework?

Response: Not Cleared

Secretariat: CAR 21: Table 26 aligns the project to the previous results framework, and the core indicators are not reported.

Please revise Table 26 using the SRF Alignment Table template and the current outcome, output and indicator numbering. Kindly also add relevant Core Indicators to the results framework itself so that the two tables report the same figures, including the SRF indicator monitoring table so that each core and Fund indicator carries its

baseline, mid-term and final targets, disaggregation categories and responsible party alongside the project-specific indicators mapped to it, and whether Indicator 3B, people implementing new or improved adaptation actions, better captures the intended result of Component Two than the awareness indicator currently used.

Please see the revised template :

<https://www.adaptation-fund.org/document/strategic-results-framework-guidance-2026/>

<https://www.adaptation-fund.org/document/alignment-with-adaptation-fund-results-framework-template-and-guidance-dec-2025/>

CAR 22: The indicators in Table 26 do not exist anywhere else in the proposal. Please aligning the project indicators in Table 26 with those in Table 25 and Annex Five so that a single set of indicators is used throughout, and where a Table 26 formulation is preferred, carrying it into the results framework with a baseline, target, data source and responsible party.

Has the sustainability of the project/programme outcomes been taken into account when designing the project? Does the project/programme support long-term development of local governance processes, and improve the capacity of local institutions to ensure that communities can effectively implement adaptation actions over the long term?

Response: Not Cleared

Secretariat: Page 44 states that "the DCCI is not creating new processes but will be strengthening existing support systems by working with IGs who through the SAF are already supporting the disadvantaged and most vulnerable." The Special Assistance Fund is a permanent, nationally funded instrument delivered through the same Island Governments to a substantially overlapping population, and building on it means the institutional architecture survives because it predates the project rather than because the project sustains it. The exit strategy (p.45) is in identifying that project data will land in two systems that outlive the project: the MIA's continuing engagement with disadvantaged families through welfare support, and the EMCI databases on household exposure that feed island disaster planning.

CR14: The proposal has no plan for maintaining the assets the project installs. Page 44 states that completing the work to a high standard "has a financial benefit for the families as future maintenance costs are reduced." Reduced is not the same as affordable or performed. The beneficiary group is defined partly by minimal income and by being elderly, living alone, or having mobility limitations (p.13), which is precisely the profile least able to carry out or pay for maintenance. The assets involved all require it: rainwater tanks and spouting need gutter clearing, first-flush maintenance and periodic tank cleaning if the water is to remain potable; septic systems need pump-out, which raises the question of whether that service exists on the smaller islands at all; and roof fastenings and tie-downs need inspection after each cyclone season, which is the specific moment at which the project's resilience gains are either preserved or lost. Assets installed from 2028 will be six years old by project close and will have needed maintenance throughout.

Nothing addresses this. There is no maintenance guidance for households, no arrangement with ICI or the Island Governments, no provision for spare or replacement components on remote islands where a failed fitting may not be replaceable locally, and no reference to warranties on materials or workmanship.

Please set out a maintenance arrangement for the installed assets, including simple household guidance provided at handover in an accessible format, and identifying who on each island is able to assist households that cannot carry out maintenance themselves. Kindly also consider whether material and workmanship warranties can be secured through the procurement arrangements, since these would protect the investment at

no additional cost to households.

CR15: The exit strategy addresses data and lessons, but not the continuation of the function. The exit strategy at p.45 is about knowledge: recording lessons for future project designs, and updating the MIA and EMCI databases. Both are valuable, but neither answers what happens to the need after 2034. The project reaches 430 dwellings out of 1,214 in the Pa Enua (Table 2, p.9), which leaves roughly two-thirds unaddressed, and the MIA register is a living list to which households continue to be added as people age, incomes fall and dwellings deteriorate. Cyclones will also damage renovated homes during and after the project period. The SAF is the obvious continuing instrument, but at its current scale it spent NZ\$156,250 across twenty completed applications in FY2024/25 (p.41), which is not a scale that absorbs continuing demand of this order.

Please set out what happens to the demand that remains at project close: whether the SAF is expected to absorb it, whether the project is intended to demonstrate a model for a standing national programme, and what would be needed for that transition. Kindly also consider whether a pathway to national or donor continuation could be identified during implementation rather than left to the terminal evaluation, since the case for it will be strongest while the project is still delivering.

CR 16: The institutional legacy rests on retention rather than institutionalization, and the roles that hold the capability end with the project. The section describes capability as something that persists by itself: experience "will be retained for future endeavours," and building the Focal Points' capacity "will also contribute to the sustainability of the communities." Nothing is described that would convert this into a standing institutional practice. No procedure is adopted into the Island Governments' own processes, none of the strengthened decision-making is folded into the SAF workflow the project explicitly builds on, and no role in the Island Government structure carries the function forward.

The Focal Points are the sharpest instance. They are the people who will accumulate seven years of practical knowledge about which dwellings on their island are exposed, what was done to each, and how the process works. The role is funded jointly by the DCCI and the EDA (Note O, p.72), both of which close, and no successor arrangement is identified. Please clarify whether the Focal Point function is expected to become a permanent Island Government position, whether MIA could absorb it through the SAF, and what specifically each Island Government is expected to be able to do on its own in 2035 that it could not do in 2027.

Does the project / programme provide an overview of environmental and social impacts / risks identified, in compliance with the Environmental and Social Policy and Gender Policy of the Fund?

Response: Not Cleared

Secretariat: Part II-K (pp.45–48) works through the fifteen ESP principles and Table 15 records a determination against each, which is the right structure. Part III-C then identifies four risks with management measures and monitoring responsibilities, and the proposal carries three supporting instruments: a Waste Reduction and Management Plan, a Gender Action Plan and a Grievance Redress Mechanism. The gender discussion in the attached document is also grounded in national data rather than assertion.

The difficulty is that these elements contradict one another. A project that requires a waste management plan, a gender action plan, a grievance mechanism and four documented mitigation measures is not a project with no adverse impacts, yet that is what the categorisation rests on.

CAR 23: The Category C determination is not supported by the proposal's own content. Page 45 states that "there will be no adverse environmental or social impacts from the implementation of the project activities" and concludes that "there are no unidentified sub-projects and therefore the DCCI should be assessed as a Category

C project." Category C applies where no adverse impacts are anticipated and no mitigation is required. This proposal identifies four risks, assigns management measures and monitoring responsibilities to each, and attaches three management instruments.

The reasoning is also constructed the wrong way round. The conclusion is drawn from the absence of unidentified sub-projects rather than from an assessment of impacts, and the sub-project position is contested separately. Where a project does involve sub-projects identified during implementation, the category should reflect the highest risk any individual sub-project could reach rather than the average across them. On this project, septic tank repair and replacement on atolls in proximity to lagoons and shallow freshwater lenses, and the disturbance of pre-2019 building materials, are the works most likely to exceed Category C on an individual dwelling.

Please revise the categorisation on the basis of the impacts the proposal itself identifies, and setting out the reasoning for whichever category is reached in terms of impacts rather than sub-project status.

CAR 24: The screening in Table 15 is inconsistent with the risk analysis and with the project description.

Table 15 (p.46) marks eight principles as requiring no further assessment for compliance, while Part III-C identifies risks and management measures for several of them. Where a principle needs a mitigation measure, the screening should sit in the second column, not the first, and Access and Equity, Marginalized and Vulnerable Groups, Gender Equality and Pollution Prevention all appear to fall into that position.

Several entries marked not applicable also warrant reconsideration:

Public Health, against a project internalising toilets and bathrooms, repairing septic tanks with an acknowledged seepage risk, and upgrading rainwater catchment used for drinking water.

Lands and Soil Conservation, against septic tank works on atolls.

Protection of Natural Habitats and Conservation of Biological Diversity, where Table 8 (p.28) claims the project will improve lagoon water quality by reducing septic seepage; a project able to affect lagoon condition positively can also affect it negatively if works are poorly executed.

Climate Change, in a project shipping building materials to eleven islands and waste back from them over six years.

Core Labour Rights, which is marked as needing no further assessment despite the deployment of CIG workers, private contractors and supplementary labour, and the proposal's own reference to the Decent Work Country Programme at p.48.

Please revise the screening so that Table 15, the risk analysis in Part III-C and the annexes are consistent with one another, and recording the reasoning for any principle that remains not applicable rather than leaving the determination unexplained. In addition, please fill the table appropriately:

- i). In the second column, please leave blank unless 'no further assessment' is required, do not include any text.
- ii). In the third column, categories the risk against all 15 principles as none, low, medium or high, briefly describe the risk and the mitigation that will be undertaken.

CAR 25: The document submitted as the ESMP is the proposal's risk narrative, not a management plan.

The attached ESMP reproduces Part III-C of the proposal: a four-row risk table, short explanatory paragraphs on each risk, and the Gender Equality section. It does not contain the elements a management plan requires. There is no procedure for screening individual dwellings once identified, no mitigation measures specified with assigned responsibility, timing and cost, no monitoring plan with indicators, methods and frequency, no institutional arrangements or assessment of the capacity of those expected to apply the measures, no training provision, no disclosure or consultation arrangements, no budget, and no reporting arrangements to the Implementing Entity or the Fund.

The risk register itself is also weak in form. All four risks are rated Low with no basis given for the rating, and two of the four entries in the risk management column are not measures: "Scale of work, plenty of time to plan" for

family disruption, and "Project design is gender sensitive and project implementation gender responsive" for gender discrimination. Monitoring is assigned to the CAM, CFP and PM, none of whom has a defined safeguards role or safeguards training.

Two risks that follow directly from the work scope are also absent. First, contamination of household water supply during works: re-roofing a dwelling whose roof feeds the rainwater tank that supplies its drinking water is a direct public health risk, and it is most acute in the Northern Group where dependence on roof catchment is near-total. Second, occupational health and safety for the workforce, which will involve working at height on roofs and handling septic systems on islands with limited medical facilities and no rapid evacuation.

Please revise the ESMP to include the mitigation, monitoring, institutional and budgetary content the ESP calls for, and kindly consider expanding the risk register to cover the works-related risks above, with ratings that are explained rather than asserted.

CR 17: Every risk is rated Low for the project as a whole, with no variation across islands that differ substantially in the conditions that drive those risks. Waste handling, septic seepage into a shallow lens, access to services during a family's temporary displacement, and the practical availability of a grievance pathway are not the same proposition on Aitutaki, with an airport, a hospital and regular shipping, as on Nassau or Rakahanga.

Please clarify whether island-level conditions were considered in arriving at the ratings, and how the assessment will be revisited as works reach each island. Kindly also clarify how the risk assessment and its mitigation measures have been or will be disclosed to affected communities, and whether the ESMP will be made available in Cook Islands Māori, since disclosure and consultation on the safeguards instruments are part of the ESP requirements and no arrangement for either is currently described.

Resource Availability

Is the requested project / programme funding within the cap of the country?

Response: Cleared

Secretariat: The requested amount is \$4,999,500.

Is the Implementing Entity Management Fee at or below 8.5% per cent of the total project/programme budget before the fee?

Response: Not Cleared

Secretariat: Yes is 6.58%.

CR 18: The fee is largely composed of a function that reads as execution rather than implementing entity oversight. US\$252,000 of the US\$308,500 fee, or 82%, is a locally recruited Project Finance Officer engaged for 84 months (Note J, p.71). Note J describes the role as responsible "for full financial management and implementation of funding in line with the grant agreement," which are executing functions. Nothing in the fee corresponds to the Implementing Entity's own costs of oversight: no NIE staff time, no supervision missions to the Pa Enua over a seven-year implementation, and no appraisal or reporting effort. Please clarify whether the Project Finance Officer sits within the NIE or within the executing structure, and what NIE oversight effort the

fee is intended to cover.

CR 19: The annual fee profile does not reconcile with the costs the fee comprises. The narrative at p.73 states that the fee is drawn as a percentage of annual project cost, and Table 29 accordingly rises and falls with activity spend, from US\$42,245 in year one to US\$30,221 in year seven. The underlying costs behave differently: the Finance Officer salary is flat at US\$36,000 a year, the audit fee is flat at US\$5,000 a year, the laptop and office supplies are one-off year-one purchases, and the terminal evaluation of US\$15,000 falls due in the final year. On that basis year one requires roughly US\$47,500 and year seven roughly US\$56,000, against the US\$30,221 scheduled. Kindly clarify how the terminal evaluation and the final year's fixed costs are met within the year seven tranche.

Are the Project/Programme Execution Costs at or below 9.5 per cent of the total project/programme budget (including the fee)?

Response: Not Cleared

Secretariat: Yes it is 2.94%.

CAR 26: The execution cost line contains almost no execution, and the justification for charging management to activity lines is not supported by the role description. Of the US\$134,000, US\$122,500 is the M&E framework lumpsum, US\$5,000 the mid-term review, US\$5,000 a one-off office supplies purchase and US\$1,500 a laptop. There is no line for the staff who execute the project, for office running costs beyond the year-one purchase, for executing entity travel, or for financial management and reporting.

Note A (p.71) explains that the Project Manager's US\$336,000 is split across Activities 1.1, 1.2, 2.3 and 2.4 because "the predominate role of the PM is to implement the outputs across all activities." The duties set out in the same note do not support this. They are to manage and coordinate implementation, oversee progress, project manage to ensure activities are completed, provide quarterly progress reports to MFEM, and assist the NIE with the progress and completion reports due to the Fund. These are execution and reporting functions, and only "provide technical advice to the project" reads as delivery. The Focal Points are similarly charged in full to Activity 2.1, assessment and evaluation of dwellings, while Note O describes the funding as raising the role to full time so that the holder "can implement associated activities from EDA as well as this AF project," which is general implementation capacity across two projects rather than delivery of that activity.

The classification is material rather than presentational. Treating the Project Manager as execution would raise execution cost from 2.94% to approximately 11.1% of the reduced activities base, above the 9.5% cap; including the Focal Points would raise it to approximately 19.0%.

Please justify the allocation against the duties actually described in Notes A and O, including what proportion of each role is delivery as opposed to management and reporting, and kindly justify or revise the execution cost so that it reflects the actual cost of executing the project. Please also clarify whether any part of the Focal Point funding supports EDA activities, since Note O as drafted indicates that it does.

Eligibility of IE

Is the project/programme submitted through an eligible Implementing Entity that has been accredited by the Board?

Response: Cleared

Secretariat: Accreditation Expiration Date for the Ministry of Finance and Economic Management (MFEM) is October 11, 2028.

Implementation Arrangements

Is there adequate arrangement for project / programme management, in compliance with the Gender Policy of the Fund? Do the implementation modalities enable giving local institutions and communities more direct access to finance and decision-making power over how adaptation actions are defined, prioritized, designed and implemented?

Response: Not Cleared

Secretariat: The management structure is clearly drawn and uses existing systems rather than inventing new ones. The chain from NIE through the PMU to the Project Manager, Focal Points and Island Governments is documented, reporting frequencies and directions are specified in Table 20 (p.56), the Tarai Vaka format and the FMIS are used rather than parallel project systems, and draft terms of reference for the three positions are attached at Annex Three. The Project Finance Officer reports to the DCD Director rather than to the Project Manager, which gives a measure of financial independence from the person managing delivery; and the placement of a resident Focal Point alongside an MIA representative to help families complete applications directly addresses the barrier the proposal itself identifies at p.23, that filling in an application form is beyond many households.

On the Gender Policy, the arrangements are where the proposal is weakest: nothing in the management structure carries responsibility for gender. On devolution, the modalities support participation and administrative involvement by Island Governments, but the body that decides is composed entirely of Rarotonga-based agencies.

CAR 27: No part of the management arrangement is accountable for gender. Table 18 (p.55) establishes three positions and none carries a gender function. No gender specialist, gender focal point or gender adviser appears anywhere in the structure, and the Gender Action Plan assigns monitoring responsibilities without any position in the management arrangement being accountable for delivery. The PMU composition set out at p.53 names representatives of MIA, ICI, DCD, CCCI and the OPM Pa Enua division, with no gender balance provision, no seat for the agency holding the national gender mandate in that capacity, and no women's organisation despite the Gender Assessment having consulted women's groups.

The one staffing target the GAP does set, that 50% of staff are women by mid-term, cannot be delivered through this project's own recruitment, since the only positions the DCCI recruits are the Project Manager and Project Finance Officer, and the Focal Points are recruited under the EDA. The draft terms of reference are also not described as carrying any gender requirement, and nothing addresses gender balance in the Island Government bodies that review applications, which is where eligibility is actually determined.

Please assign explicit responsibility for gender within the management structure, whether as a dedicated role or as a defined function within an existing position with time and budget attached. Kindly also consider including the gender requirements into the terms of reference and the recruitment process, and whether the GAP's staffing target should be reframed around positions this project actually controls.

CAR 28: The PMU's stated role does not match its functions, and it has no terms of reference or local representation.

Page 53 describes the PMU as one representative from each CIG agency whose role "will be to provide updates on their agency's activities that overlap with the DCCI and facilitate coordination." The functions then listed on the following page are of an entirely different order: recruiting the Project Manager and Finance Officer, conducting the assessment of island proposals, providing feedback on Island Government recommendations, facilitating individual grant agreements, and overseeing procurement and shipping. This is a decision-making and approval body, not a coordination forum, and it is the final determinant on 430 household applications. No chair, seniority level, quorum, decision rule, conflict of interest provision or terms of reference is given, and no separate oversight or steering body exists above it, so the PMU both governs and manages.

On representation, the member described as "a Pa Enua Island Government representative from the Pa Enua division at the OPM" is a Rarotonga-based central government official from the division responsible for the Pa Enua, not a representative of any Island Government. No Island Government holds a seat on the body that approves applications from its own island, and no rotating or delegated arrangement is proposed.

Please prepare terms of reference for the PMU covering membership, chairing, quorum, decision rules and conflict of interest, and kindly consider whether Island Governments could be represented on the body directly, whether through a rotating seat or through the Pa Enua Forum, given the extent of the decisions the PMU takes on their behalf.

CR 20: The Focal Point sits in two staffing structures with a single reporting line, and island-level supervision is split.

The Climate Change Focal Point appears twice: in Table 18 (p.55) as DCCI project implementation staff reporting to the Project Manager, and in Table 19 (p.55) as EDA project staff, again reporting to the DCCI Project Manager. The role is recruited under the EDA, part-funded by each project, and works on both. The Contract Activity Manager on the same island reports instead to the EDA Project Manager, yet the two file a joint monthly report and share responsibility for materials, storage and works oversight.

Please clarify who performance-manages the Focal Point and on what basis, how competing demands between the two projects are resolved when both are active on an island, and what happens to the role if the EDA's share of the funding ceases. Please further clarify how the split supervision of the CAM and CFP is expected to work in practice on a small island where the two are the entire project presence.

CR 21: No instrument is proposed with the Island Governments, although they carry substantial responsibilities. Page 53 states that MOUs will be agreed with MIA and ICI after approval and before the Inception Workshop. No comparable instrument is proposed with the eleven Island Governments, which are expected to support workshops, receive and review all applications, make funding recommendations, receive and secure materials, confirm implementation schedules and endorse monthly reports across seven years. Nor is any arrangement identified with the Ministry of Health or the National Environment Service, both of which are required for the consent pathway described at p.30, and neither of which sits on the PMU. Kindly clarify what instrument, if any, will define the Island Government role and what each side commits to, and what the MIA and ICI MOUs are expected to cover.

Are there measures for financial and project/programme risk management? Do local stakeholders contribute to the design and management of the project risk management?

Response: Not Cleared

Secretariat: Table 21 (pp.59–60) sets out sixteen risks across financial and project categories, seven of them rated medium, which shows the register has not been flattened to reassure. The works payment process (p.58) is properly specified. The theft narrative sets out a six-step chain of custody from procurement through to on-site use. Workplace injury is grounded in the Employment Relations Act with named controls. Cyclone risk is rated medium with realistic mitigation rather than being assumed away. The methodology is also stated openly. However local stakeholders did not contribute to the risk assessment and have almost no role in managing risk.

CAR 29: The risk assessment draws on no Pa Enua source, and the risks islanders would raise are absent.

Page 59 lists five inputs to the assessment: reports and lessons from previous AF projects in the Pa Enua, discussions with the NIE and other CIG agencies, EDA risks for Tier One families, other countries' LLA projects, and CCCI personnel knowledge. Every one is a Rarotonga or external source. Despite 523 people having been consulted, including Island Government leadership at the Pa Enua Forum and community members on four islands, no Island Government, community or prospective beneficiary contributed to identifying what could go wrong.

The consequences are visible in the register. Missing are the operational risks that will most plausibly determine whether 430 houses are completed: failure or delay of inter-island shipping, which the proposal's own consultation schedule illustrates when island visits slipped by roughly fifteen months on airline logistics (p.39); the availability of sufficient skilled labour on small islands across a six-year works programme; materials arriving damaged, short or incorrect on an island where replacement may take months; and works commenced but not completed, leaving a household living in a partly demolished home.

Management is similarly centralised. Across sixteen rows, the Island Government appears in the monitoring column three times and communities or households not at all. Nothing in the arrangements allows a household or an Island Government to raise an emerging risk, and the quarterly risk assessment is completed by the Project Manager alone (p.61).

Please Include island-level risks into the register, so that each island's own conditions are reflected. Kindly also consider giving Island Governments a defined role in the periodic risk review, since the monthly reports they already endorse would be a natural vehicle for surfacing emerging risks from the islands upward.

CAR 30: The mitigation described for cost overruns is not present in the budget. Page 59 states that "an annual allowance of 3.1% of project expenditure has been included in the proposed budget," against an MFEM inflation forecast of 2.7% for 2027/28 and 2028/29. The budget does not contain this. Budget Note H (p.71) provides US \$112,000 for inflation on building materials, which is approximately 3.2% of the US\$3,483,000 materials cost in total across the whole implementation period, not 3.1% each year. Over a works programme running from 2028 to 2034 at the forecast rate, compounding on materials would be in the order of 20%, or roughly US\$700,000, in a country sourcing 79.2% of its imports from a single trading partner. The gap between the stated mitigation and the provision made is therefore substantial, and cost overrun is the one financial risk the proposal itself rates medium.

Please reconcile the narrative with the budget, either by providing the annual allowance described or by restating the mitigation to reflect what is actually provided. Kindly also consider what the fallback would be if materials inflation exceeds the provision, given that the number of households is a fixed target and the per-household allocation is already below full compliance cost.

CR 22: Ratings are based on probability alone, with no impact dimension, no residual rating and no single owner.

Page 58 states that "the risk classification level is based on the probability of a risk occurring." Risk is conventionally assessed on probability and consequence together, and the absence of the second dimension produces results that do not discriminate usefully. A cyclone striking during implementation and staff turnover are both rated medium, although one would halt works across an island group and damage completed dwellings while the other is a manageable handover problem. There is also no residual rating showing where each risk sits once the stated mitigation is applied, and the monitoring column names groups rather than an accountable owner, so for several risks it is not clear who is answerable.

One rating in particular would benefit from explanation. Corruption is rated low, mitigated by decision-making criteria being transparent. No applicant or approval list is published locally, and no conflict of interest declaration or recusal provision appears anywhere in the review process at Figure 11 (p.51) or in the PMU arrangements. Please clarify how the low rating was reached and whether a conflict of interest provision could be added to the review process.

Are there measures in place for the management of environmental and social risks, in line with the Environmental and Social Policy and Gender Policy of the Fund? Do local actors contribute to developing and managing these measures?

Response: Not Cleared

Secretariat: Measures exist, in three instruments. Table 22 (p.62) attaches management responses and monitoring responsibilities to each identified risk; the Waste Reduction and Management Plan at Annex Two addresses the project's principal environmental impact; the Gender Action Plan at Annex Four sets out activities, indicators, targets, timelines, responsibilities and costs, which is the right structure for a management instrument; and the Grievance Redress Mechanism at Annex Five gives affected people a route to raise concerns. The commitment at p.56 to report gender monitoring indicators through the monthly island reports is also the correct instinct, embedding gender monitoring in routine reporting rather than leaving it to evaluation.

CAR 31: The measures are designed and monitored centrally, and Island Governments and households have no part in either. Nothing indicates that Pa Enua communities or Island Governments contributed to identifying the environmental and social risks or to shaping the responses. The Gender Assessment draws on national sources, principally UN Women 2022 and the 2014 Family Health and Safety Study, rather than on island-level findings, and no gender-differentiated views from the 523 people consulted appear in it. The Waste Reduction and Management Plan proposes segregation on island and back-loading of plastics and metals to Rarotonga, which are decisions about facilities and practices the Island Governments own, yet there is no indication the plan was developed with them.

Management is equally centralised. The monitoring column in Table 22 names the CAM, CFP and PM. The Island Government does not appear against any of the four risks, although it runs the island waste facility, receives and secures the materials, and is the body households will approach first when something goes wrong. Households appear nowhere. Of the two island-based roles that do carry monitoring duties, the Contract Activity Manager is funded by the EDA and reports to the EDA Project Manager (Table 19, p.55), so the person responsible for observing safeguards on each island is accountable outside this project and outside the island.

Please include Island Governments into the development of the waste plan and the island-level elements of the gender plan, and kindly consider giving them a defined monitoring role in Table 22 alongside the CAM and CFP, since the monthly report they already endorse provides a ready mechanism for it.

CR 23: It is not clear how the waste plan will be delivered on each island. The plan depends on actions taken on the islands: segregation at each of more than 400 building sites, secure interim storage, and consolidation for back-loading. It is not stated who performs these tasks, what agreement exists with the Island Government

whose waste facility and land will be used, or what happens on islands where no facility or reliable outbound shipping exists. Activity 2.4 carries US\$83,000 for waste removal (p.70) with no allocation by island and no indication that any part of it reaches the Island Governments carrying out the work. Please clarify the island-level arrangements, and how waste already generated will be held on an island where the next suitable vessel may be months away.

CR 24: The operational readiness of the grievance mechanism and the gender indicators is not described. Page 56 commits the CAM and CFP to reporting the relevant gender monitoring indicators and any grievances recorded in each monthly report, but the GAP does not identify which of its indicators are island-reportable, and neither role has any gender or safeguards training. On grievances, please clarify how the mechanism functions in practice at island level: in what language a grievance can be lodged, what provision exists for a person who cannot read or write, given that the beneficiary group is defined partly by age and infirmity, what timeframes apply, who holds the record, and what a complainant is told about the outcome. These details help determine whether the mechanism is usable by the people it is for.

Is a budget on the Implementing Entity Management Fee use included?

Response: Not Cleared

Secretariat: Yes. Table 27 (p.70) itemises the Project Cycle Management Cost into five lines, each with a unit, quantity, unit cost and total, summing exactly to the US\$308,500.

CR 25: Budget Note Q does not sum to the amount it states. The list totals US\$12,000. It would help to clarify the printer quantity and unit price so the note reconciles to the amount stated.

Is an explanation and a breakdown of the execution costs included?

Response: Not Cleared

Secretariat: Yes. Table 27 (p.70) itemises the US\$134,000 execution cost into four lines, each with a unit, quantity, unit cost and total.

CR 26: The lumpsum lines are not built up from anything, and the largest carries a one-sentence explanation. Only the IT equipment line has a genuine unit basis. The remaining three are entered as lumpsums, and the M&E framework line, which is 91% of the execution cost, is explained by Note S in a single sentence stating that it covers monitoring and evaluation of the project as well as the GRM function. No derivation is offered for the US\$17,500 annual figure, no cross-reference is made to the more detailed table in Part III-D, and the annual amount is flat across all seven years although the underlying effort is not, since establishment and baseline work fall in year one, works run only from year two, and closure activity concentrates at the end.

Kindly include how the two lumpsum lines built up from their components, and the annual profile of the M&E line adjusted to reflect when the work actually falls.

Is a detailed budget including budget notes included?

Response: Not Cleared

Secretariat: Yes. Table 27 (pp.70–71) presents the budget by component, output and activity, with each line carrying a budget category, unit, quantity, unit cost and total, and a note reference. Table 28 (pp.71–72) provides nineteen notes. However the internal sub-totals and several notes, however, do not reconcile with each other.

CAR 32: The budget table and its notes contain reconciliation errors that should be corrected:

1. Activity sub-totals for 2.2 and 2.3 are transposed. In Table 27 the sub-total against Activity 2.2 is US \$3,751,500, which is the building materials line of US\$3,681,000 plus US\$70,500 of workshop, travel, per diem and accommodation costs that belong to Activity 2.3. Activity 2.3 is then sub-totalled at US\$96,000, being the Project Manager line alone. Table 4 (pp.16–17) records the same activities correctly as US\$3,681,000 and US \$166,500. Both versions sum to US\$3,847,500, so the grand total is unaffected, but the two presentations of the same activities disagree.
2. The Component 2 sub-total omits Activity 2.4. The figure shown for Component 2 in Table 27 is US\$4,127,500, which is Activities 2.1, 2.2 and 2.3 only. With Activity 2.4 at US\$131,000 the component total is US\$4,258,500, which is the figure used in Table 4 and required to reconcile to total activities of US\$4,557,000.
3. Note H contains a transcription error. The note reads "Total Budget \$3,681,000 less \$3,483,000 is \$198,000." The intended figure is US\$3,483,000, being 430 households at US\$8,100, and the arithmetic that follows is correct on that basis.
4. Note O refers to six focal points where the project has eleven islands. The line is entered as six units at US \$46,666.67 for US\$280,000, and the note describes support for "the x6 Focal points in the outer islands." Table 18 (p.55) places a Focal Point on each island and the results framework covers eleven Island Governments, so either the unit count or the island coverage needs correcting.
5. The salary figure in the disbursement schedule does not reconcile to the budget. Page 73 explains each tranche as houses multiplied by US\$8,300 plus salaries of US\$82,800. The staff costs sitting within project funds are the Project Manager at US\$48,000 a year and the Focal Points at US\$280,000 across the implementation period, which give roughly US\$88,000 or US\$94,700 a year depending on the period assumed; the Project Finance Officer is in the management fee and should not appear here. The US\$112,000 inflation allowance is also absent from the worked example, although it is inside the US\$3,681,000 total.

Please correct these so that Table 4, Table 27, Table 28 and Table 29 present the same figures for the same items. Kindly also clarify the composition of the US\$491,200 signing tranche, since no dwellings are renovated in the establishment year and Component One spans four years rather than one.

Are arrangements for monitoring and evaluation clearly defined, including budgeted M&E plans and sex-disaggregated data, targets and indicators, in compliance with the Gender Policy of the Fund? Do monitoring and innovation arrangement enable monitoring by the community and local actors (including by deploying innovative tools)?

Response: Not Cleared

Secretariat: Part III-D (pp.64–67) separates implementation monitoring, evaluation and reporting; Annex Six Table 8.1 carries indicators, data sources and monitoring responsibility at output and activity level; and Table 23 (p.65) sets out financial monitoring with data sources, methods, frequency and responsibility, which is more than most proposals provide. The positions on independence are right: the mid-term review may be independent or semi-independent and facilitated by the NIE, and the terminal evaluation is commissioned as an independent review by a team the NIE selects.

On the Gender Policy, disaggregation is genuinely present in the results framework rather than merely asserted: five indicators across Outputs 1.1, 1.2 and Outcome Two specify disaggregation by gender and age.

CAR 33: The M&E budget does not reconcile, and most of it is not M&E. Table 24 (p.67) gives a total of US \$122,000 built on six years at varying annual rates. Budget line S in Table 27 gives US\$122,500, calculated as seven years at US\$17,500. The two differ in both amount and duration.

The composition is the larger issue. Of the US\$122,000, US\$56,000 is implementation of the Gender Action Plan, which is a safeguards function rather than monitoring and evaluation, and Note S (p.72) adds that the same line also covers the GRM function, which is not costed separately anywhere in the budget. The project's entire gender and grievance provision therefore sits inside an undifferentiated monitoring lumpsum. What remains for M&E proper is US\$66,000 across six years, or about US\$11,000 a year, covering data collection, workshops, communications and emergency travel for a project spanning eleven islands.

Page 66 explains that no budget column appears in Annex Six Table 8.1 because the M&E actions "are included as part of the responsibilities of project staff." Those staff are the Project Manager, whose salary is already allocated in full across four activity lines, and the Focal Points, whose funding Note O describes as covering implementation across two projects. M&E is accordingly resourced from staff time that is fully committed elsewhere.

Please consider separating the Gender Action Plan and the grievance mechanism into their own budget lines, aligning Table 24 and Table 27 on both amount and duration, and setting out what M&E effort the residual provision includes.

CAR 34: Evaluation is conducted quarterly by the PMU, which is also the body that approves applications and oversees procurement, so at quarterly level the project is evaluated by the entity implementing it; independence enters only at mid-term review and terminal evaluation, and the terms of reference for both are set nationally with no Island Government input. Island Governments endorse monthly reports and receive annual reports, and households sign off on their own dwelling, but nothing gives either a view on whether the project as a whole is working. The one element that could have provided this, "a survey commissioned to assess household satisfaction" at p.66, has no indicator, target or timing and does not appear in the results framework. On tools, the system is monthly narrative reports through five tiers, with nothing suited to verifying physical works on 430 dwellings across eleven remote islands, where photographic verification against the dwelling-level data already listed at p.67 would be a natural fit.

Please make the following corrections to Part III-D and the results framework: Please state how Island Governments will contribute to the terms of reference for the mid-term review and the terminal evaluation. Consider converting the household satisfaction survey into a monitored element. Adding it to the results framework with an indicator, baseline, target, timing and data collection method, and confirm its cost within the M&E budget. Consider establishing a verification method proportionate to the works. Specify how completed renovations will be verified across eleven islands, including photographic verification by the Focal Points against the dwelling-level data already listed at p.67, such as roof area replaced, number and volume of water tanks and length of guttering, and confirm where that record is held.

CR 27: Disaggregation is applied to data collection but not to targets, and two documents carry different targets. Five indicators in Table 25 (pp.68–69) specify disaggregation by gender and age, but none of the corresponding targets is disaggregated: Output 1.2 targets "total of 250 people" and "430 total applications" with the number of women submitting recorded but untargeted, and Outcome Two targets "1400 people" with no target for women. The Gender Action Plan does set female targets, including 700 women living in renovated homes and 200 women completing applications, but these do not appear in the results framework, which is the instrument reported through the PPR. Age bands are not defined anywhere, and disability is not a disaggregation category although it is one of the four characteristics defining the beneficiary group at p.13. Outcome One is not disaggregated at all.

Kindly clarify how the sex-disaggregated targets carried into the results framework itself, aligned with those in the GAP, with age bands specified and disability considered as a further disaggregation given the project's targeting.

Does the M&E Framework include a break-down of how implementing entity IE fees will be utilized in the supervision of the M&E function?

Response: Not Cleared

Secretariat: No. The fee is itemised in Table 27 (p.70), but nothing in that itemisation is presented as IE supervision of monitoring and evaluation, and Part III-D does not connect any part of the fee to the M&E function. Of the five fee lines, only the terminal evaluation at US\$15,000 is an M&E cost. The audit fee at US\$35,000 is assurance rather than M&E supervision, and the remaining US\$258,500 is the Project Finance Officer, office supplies and a laptop.

The NIE's M&E responsibilities are described narratively at pp.65–66: overseeing the annual PPR, facilitating the mid-term review, and commissioning the terminal evaluation through an independently selected team. None of these except the terminal evaluation carries a cost in the fee breakdown. There is no allocation for NIE staff time to review and verify reported results, no supervision mission to any island across a seven-year implementation, and no provision for the NIE's role in the mid-term review, which is itself budgeted at US\$5,000 within execution cost rather than within the fee.

CR 28: The NIE is assigned real M&E responsibilities at pp.65–66, including oversight of the annual PPR, facilitation of the mid-term review and commissioning of the terminal evaluation. Only the last of these appears in the fee breakdown. Please clarify the fee disaggregated to show what covers NIE oversight of the M&E function specifically, including time for reviewing and verifying reported results, and whether any supervision visit to the Pa Enua is contemplated over the seven years. Kindly further clarify why the mid-term review sits in execution cost while the terminal evaluation sits in the fee, given the NIE facilitates the first and commissions the second. See CR 19.

Does the project/programme's results framework align with the AF's results framework? Does it include at least one core outcome indicator from the Fund's results framework?

Response: Not Cleared

Secretariat: CAR 35: The alignment table should be completed using the current Adaptation Fund template, with corresponding outputs and budget shown at both levels. Table 26 (pp.69–70) does not follow the current format of the Fund's results framework alignment table. Please use the most recent template, available at <https://www.adaptation-fund.org/document/strategic-results-framework-guidance-2026/>

<https://www.adaptation-fund.org/document/alignment-with-adaptation-fund-results-framework-template-and-guidance-dec-2025/>, and in completing it kindly observe the following:

1. Each AF Outcome shown in the upper table must have its corresponding AF Output carried through to the lower table, so that the two levels read as a single chain. At present the correspondence between Outcome 3 and Output 3.1, and between Outcome 4 and Output 4, has to be inferred by the reader rather than being shown.
2. The budget should be separated by outcome and by output indicator in both tables. The upper table currently carries grant amounts of US\$298,500 and US\$4,258,500 against the two objectives, but the lower table has no

budget column at all, so the amounts attaching to each output cannot be seen.

Please only use relevant AF indicators and include relevant core indicators.

CAR 36: The results chain differs across the three places it is presented. Please align Figure 6, Table 4, Table 25 and Table 26 to a single results chain using project-level output numbering throughout, so that the same outcome carries the same wording and the same indicators wherever it appears.

Is a disbursement schedule with time-bound milestones included?

Response: Not Cleared

Secretariat: Table 29 (p.73) sets out annual tranches across the seven-year implementation, separating project funds, execution cost and management fee, with totals reconciling exactly to US\$4,999,500.

CAR 37: The tranches are not linked to milestones, and six of the seven years have none. Table 29 is a calendar profile: it shows when money is expected to flow, but no deliverable, achievement or condition is attached to any tranche. The four milestones in Table 5 are not mapped to it, and two of them fall at or after the end of the disbursement period. What the criterion asks for is a schedule in which each tranche is released against defined, dated achievements.

Page 57 then states that "the specific timing of the other implementation activities for the remaining six years cannot be specified at present," with scheduling to be confirmed annually through each progress report. The reasoning is understandable, since works depend on the application process and Island Government input, but the effect is that no time-bound milestones exist for the period covering 94% of the budget. The figures given are averages rather than milestones, and the two averages offered are inconsistent: p.57 states 430 houses divided by six years gives 72 a year, while the tranche arithmetic in Table 29 implies a varying profile of roughly 72, 80, 80, 78, 70 and 50.

Please attach a milestone to each tranche, expressed in terms the project can verify, such as the number of islands with completed assessments, materials landed, or dwellings signed off by the end of each year. Kindly also provide an indicative island sequencing schedule for years two to seven, even if provisional, since the tranche amounts already assume a specific annual profile of completions and that profile could be stated as the milestone set.



ADAPTATION FUND

FULLY DEVELOPED PROPOSAL FOR SINGLE COUNTRY

PART I: PROJECT INFORMATION

Title of Project: *Increasing the Resilience of Disadvantaged Communities in the Cook Islands*

Country: *Cook Islands*

Thematic Focal Area: *Locally-Led Adaptation*

Type of Implementing Entity: *National Implementing Entity*

Implementing Entity: *Cook Islands Ministry of Finance and Economic Management*

Executing Entity: *Climate Change Cook Islands, Office of the Prime Minister, Cook Islands.*

Amount of Financing Requested: **\$4,999,500.00** (in U.S Dollars Equivalent)

Letter of Endorsement (LOE) signed: Yes ☒ No ☐

NOTE: The LOE should be signed by the Designated Authority (DA). The signatory DA must be on file with the Adaptation Fund. To find the DA currently on file check this page: <https://www.adaptation-fund.org/apply-funding/designated-authorities>

Stage of Submission:

☐ This proposal has been submitted before including at a different stage (pre-concept, concept, fully- developed proposal)

☒ This is the first submission ever of the proposal at any stage

In case of a resubmission, please indicate the last submission date: Click or tap to enter a date.

ACRONYMS

AF	Adaptation Fund
AML	Anti-Money Laundering
BC	Cook Islands Building Code 2019
CCCI	Climate Change Cook Islands
CFP	Climate Change Focal Point
CFT	Countering of Financing Terrorism
CIG	Cook Islands Government
CITTI	Cook Islands Tertiary Training Institute
DCCI	Shortened acronym for Increasing the Resilience of Disadvantaged Communities in the Cook Islands
DCD	Development Coordination Division
EDA	Enhanced Direct Access
EDS	Economic Development Strategy
EE	Executing Entity
EEZ	Exclusive Economic Zone
EIA	Environmental Impact Assessment
EMCI	Emergency Management Cook Islands
EO	Executive Officer
FMIS	Financial Management Information System
FP	Funding Proposal
FY	Financial Year
GAP	Gender Action Plan
GCF	Green Climate Fund
GDP	Gross Domestic Product
GRM	Grievance Redress Mechanism
HOA	Head of Agency
ICI	Infrastructure Cook Islands
IG	Island Government
IPCC	Intergovernmental Panel on Climate Change
LLA	Locally-Led Adaptation
ME	Monitoring and Evaluation
MFEM	Ministry of Finance and Economic Management
MIA	Ministry of Internal Affairs
MOH	Ministry of Health
NDC	Nationally Determined Contributions
NES	National Environment Service
NGO	Non-Government Organisations
NIE	National Implementing Entity
NSDA	National Sustainable Development Agenda
NZD	New Zealand Dollar
OPM	Office of the Prime Minister
PEARL	Pa Enua Action for Resilient Livelihoods
PMU	Project Management Unit
PPR	Project Performance Report

SAF	Special Assistance Fund
SPCZ	South Pacific Convergence Zone
SRIC- CC	Strengthening the Resilience of our Islands and our Communities to Climate Change
TC	Tender Committee
TPC	Tier One Project Coordinator
TOR	Terms of Reference
UNDP	United Nations Development Programme
V&A	Vulnerability and Adaptation
WMO	World Meteorological Organisation

PROJECT BACKGROUND AND CONTEXT

THE COOK ISLANDS

The Cook Islands is a large Ocean State situated in the central-south Pacific Ocean. The country is bordered by French Polynesia to the east, Kiribati to the north, and Niue, American Samoa and Tokelau to the west. South of the country is open ocean to the Antarctic.

Figure 1
Location of the Cook Islands



Source: Tuna Pacific Magazine, Forum Fisheries Agency, December 2017.

The capital of Avarua is on the main island of Rarotonga which holds more than 70% of the resident population and is the site of the major international airport and harbour. Rarotonga is also the administrative centre and the location for the main offices of all the Cook Islands Public Service Ministries and State-Owned Enterprises¹.

Constitutionally, the Cook Islands are a self-governing country in free-association with New Zealand. The Cook Islands is responsible for all its own affairs under a Parliament of 24 elected members, with elections every four years. The King's Representative, who is nominated by the Government, is the Head of State, however the political party with the majority in Parliament governs through the Prime Minister and a Cabinet of six ministers.

¹ OPM, 2019. *Cook Islands Third National Communication under the United Nations Framework Convention on Climate Change*, Office of the Prime Minister, Rarotonga, Cook Islands.

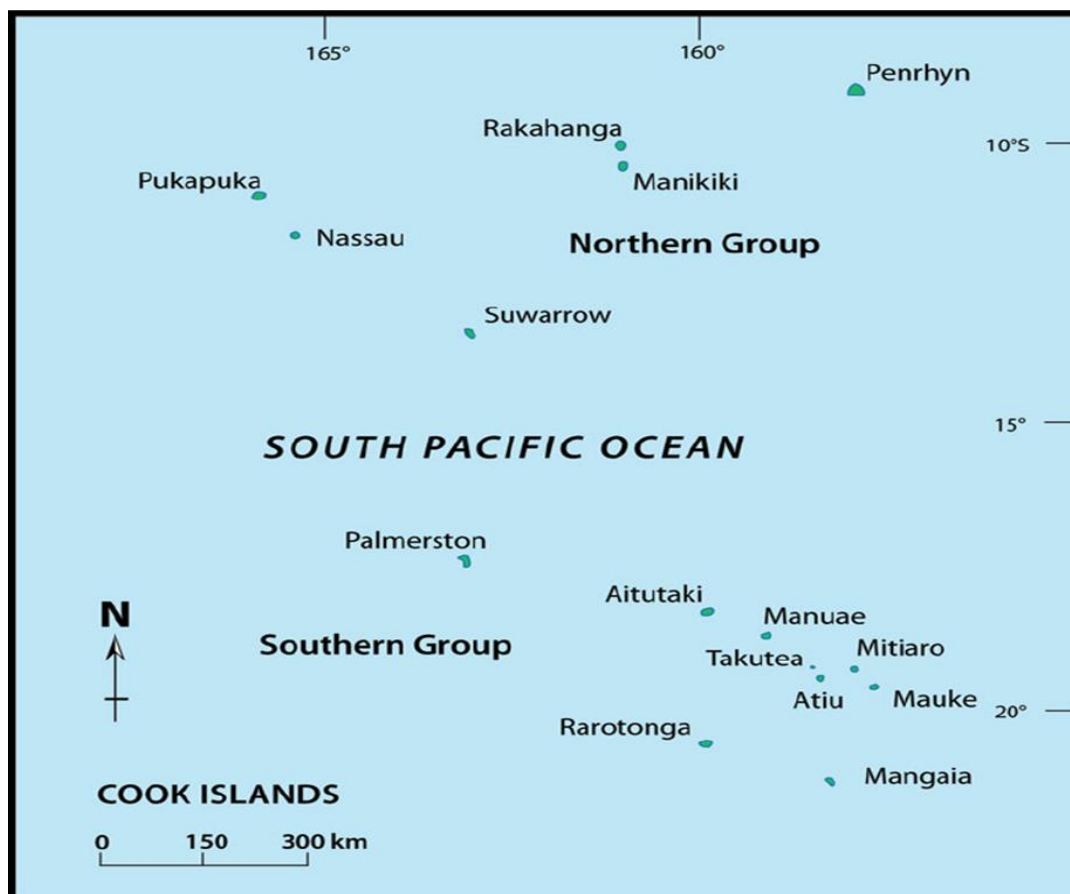
Environmental Context

The Cook Islands Exclusive Economic Zone (EEZ) measures 1.97 million square kilometres, the 20th largest in the world. The islands in the Cook Islands are a geological mix of sand cays, low-lying coral atolls, raised coral islands, and small volcanic islands. The fifteen islands are commonly divided into the Northern Group and the Southern Group as shown in Figure 2: Map of the Cook Islands.

The Northern Group consists of five atolls and one sand cay (Nassau). Lagoons, fringing reefs and very small land areas characterise the islands in the Northern Group. The Southern Group is more mixed with four raised coral islands (Mangaia, Atiu, Mauke and Mitiaro), two atolls (Palmerston and Manuae), one almost-atoll (Aitutaki), one sand cay (Takutea) and one small volcanic island (Rarotonga)².

Only the main island of Rarotonga has peaks over 200 metres above sea level. The total land mass for the country is 236.7 square kilometres.

Figure 2
Map of the Cook Islands



Source: ResearchGate.net, n.d.

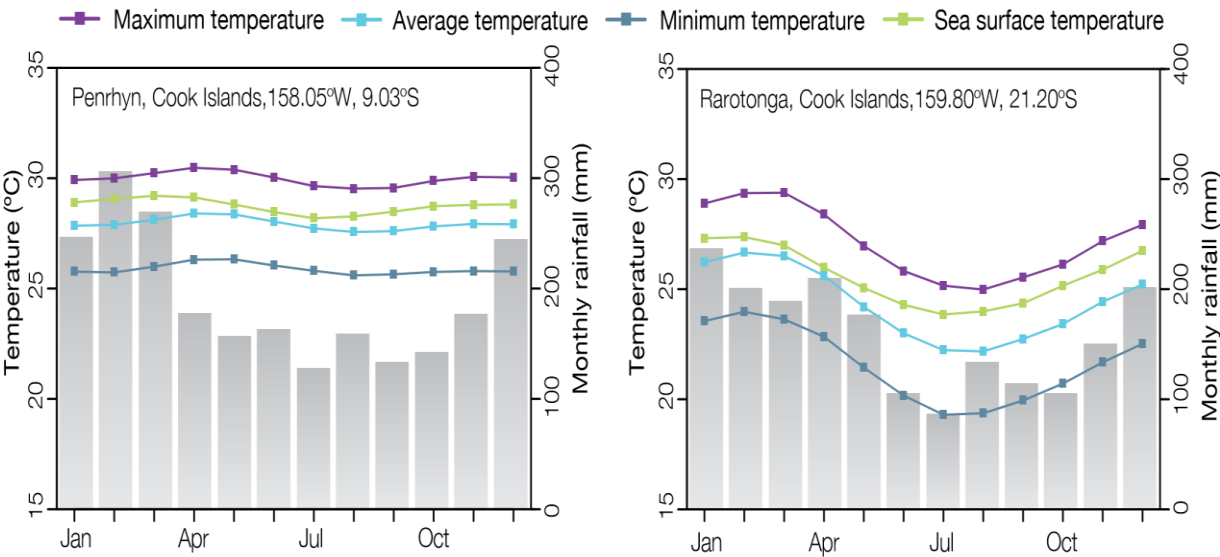
² NES, 2019, pg 9. *Cook Islands National Invasive Species Strategy And Action Plan 2019 – 2025*, National Environment Service, Rarotonga, Cook Islands,

There are no large rivers in the Cook Islands and the streams are dependent on run-off from the inland areas of the higher islands. Underground aquifers are accessed through boreholes on some of the higher larger islands.

The climate of the Cook Islands is tropical and predominantly influenced by the ocean without the impact of any significant land mass. There is a noticeable difference in climate between the Northern and Southern group due to geographical location. As an example, Figure Three: Seasonal Rainfall and Temperature at Rarotonga and Penrhyn shows that there is little diurnal or seasonal variation to temperature in the Northern group, but these variations are much more evident in the Southern group.

There is a distinct wet season from November to April when two-thirds of the average annual rainfall of 2000 mm occurs. However, there is substantial variation in rainfall from year to year in the Cook Islands. The wetter and hotter period from November to April also coincides with the cyclone season. The trade winds normally blow from the south-east during the drier period from May to October. This will change to blowing mainly from the north-west during the cyclone season.

Figure 3
Seasonal Rainfall and Temperature at Rarotonga and Penrhyn.



Source: Current and Future Climate of the Cook Islands, 2015, pg. 2

Population Characteristics

At the last Census in December 2021, the resident population of the Cook Islands was 14,974. Twelve of the 15 islands of the Cook Islands are inhabited. Apart from Rarotonga and Aitutaki, the communities have less than 500 people, and income is predominantly from central and local government jobs. While the population number has remained stable, the demographic composition of the resident population is changing.

Table One: Cook Islands Resident Population Selected Census Data shows census data over a 15-year period from 2006 to 2021. Despite the stable national population number since the

late 1990s, the amount of the population aged 60 and over is increasing steadily and as a percentage, has increased by over 50% between the 2006 and 2021 Census. The increase is consistent amongst all islands with the percentage in the *Pa Enua*³ being slightly higher than the national figure.

In contrast, while the working population, defined as those aged between 15 and 59, has remained around 58% of the population, the percentage of the population aged less than 15 years old has decreased by almost 20% during the same period. As New Zealand passport holders, Cook Islanders can move freely into New Zealand, and this option is exercised regularly by families looking for employment opportunities⁴.

Table 1

Cook Islands Resident Population Selected Census Data.

Item	2006	2011	2016	2021	% Change since 2006
Total Resident Population	15324	14974	14802	14987	-2.20%
Rarotonga based Population	10226	10572	10649	10863	+6.23%
Non-Rarotonga based Population	5098	4402	4153	4124	-19.11%
Female Population Percentage	48.96	49.98	50.74	50.83	+3.82%
Male Population Percentage	51.04	50.02	49.26	49.17	-3.66%
Population Percentage 60 years and above	11.0	13.0	14.99	16.86	+53.27%
Population Percentage Aged 15-59 years	58.00	58.0	58.01	58.00	0%
Population Percentage Aged 0-14 years	31.0	29.0	27.00	25.14	-18.9%

Source: Census Reports, Department of Statistics, Ministry of Finance and Economic Management, Cook Islands.

Urbanization is not significant, but over 70% of the total population lives on Rarotonga and 12% live on Aitutaki. On every island, most of the population live and work within 700 metres of the coast. While the resident population on most of the *Pa Enua* islands is steadily decreasing, the Rarotonga population is slowly increasing because of urban drift and migrant labour⁵.

The Census data also shows that average household sizes continue to decrease and between 2006 and 2021 went from 3.7 to 3.2 respectively⁶. This decline has continued from 1991, when

³ *Pa Enua* is the term in Cook Islands Maori which refers to the all the islands apart from Rarotonga.

⁴ OPM, 2019, pg 24.

⁵ CIG, 2021, pg 19. *Cook Islands Census 2021*, Rarotonga Cook Islands

⁶ Ibid, pg 30.

the average household size was recorded at 4.9 in the Census of that year.

Economic Context

The Cook Islands economy has been growing steadily since an economic reform period in the late 1990's. The Global Financial Crisis caused a brief downturn during 2007 and 2008, and more recently, the Covid Pandemic in 2020/21, but the economy has bounced back quickly, and real GDP is expected to grow 2.5 per cent in the 2025/26 financial year⁷. The economy is strongly service-driven, with tourism employing over 50% of the labour force.

The most significant influence on the Cook Islands economy is the New Zealand economy. The New Zealand dollar (NZD) is the Cook Islands' main currency and fluctuations in the NZD can greatly impact on the returns of the Cook Islands main foreign exchange earner, the tourism industry. In 2023/24, New Zealand was the main source of imports into the Cook Islands (79.2%)⁸ and also the source of the largest tourist numbers (68.0%)⁹. This reliance on external markets and imports makes the economy highly vulnerable to global shocks and climate-related disruptions such as cyclones affecting transport and tourism flows.

Subsistence economic activity is an important part of the Cook Islands economy and a significant part of sustaining communities, particularly in the *Pa Enua*. Many households will combine salary or wage income with secondary income from selling surplus goods from subsistence activities. However, these communities face higher costs for goods and services, limited connectivity, and greater exposure to climate hazards such as sea-level rise and extreme weather events.

Key Economic Industries

Tourism is estimated to generate about 65% of direct economic activity in the Cook Islands economy¹⁰. Tourist numbers continue to recover post-Covid, with 163,342 visitors arriving in FY2023/24¹¹. The total visitor number is predicted to grow by almost 6% in the 2024/25 FY¹². Agriculture, Fishing, Construction and Finance are other key sectors.

In 2021, 70 per cent of all households in the Cook Islands were engaged in one or more types of agricultural activity¹³. Of these households, 20% were producing for a combination of their own consumption and commercial purposes.

Fishing is still an important part of social and cultural life in the Cook Islands. Over 42% of households in 2021 engaged in fishing activity, whether for subsistence or commercial purposes. There is only one full-time commercial operator based in the country who is targeting larger offshore fish species, but closer in-shore artisanal fishers caught approximately 100 tonne of fish in 2024. The artisanal catch is all sold domestically for an estimated value of NZ\$3.0 million. Black pearl farming is also a fisheries activity and family-based farms in

⁷ CIG, 2025, pg 28. *Cook Islands Government Budget Estimates 2025/26*, Rarotonga, Cook Islands.

⁸ CIG, 2024, pg 56. *Cook Islands Government Half-Year Economic and Fiscal Update 2024/25* Rarotonga, Cook Islands.

⁹ CIG, 2024, Data from Table 4-4, pg 59.

¹⁰ CIG, 2025, From Table 4-1, pg 28.

¹¹ CIG, 2024, pg 59.

¹² CIG, 2024, Dat from Table 4-4, pg 59

¹³ CIG, 2021, pg 33.

Manihiki sell domestically in Rarotonga.

The total value of building approvals in the Cook Islands for the financial year 2023/24 grew strongly, moving from \$23.8 million in the year to June 2023 to \$25.2 million in the year to June 2024. The growth is predominantly driven by an increase in tourism accommodation¹⁴.

The Cook Islands financial services sector experienced a downturn during the Covid pandemic but has bounced back. In 2022/23, the sector's GDP contribution rebounded to \$51.1 million and remained at that level in 2023/24, as one of the largest sectors in the Cook Islands economy¹⁵.

Despite strong per capita income, structural vulnerabilities persist. COVID-19 caused a sharp –24.5% GDP contraction in 2021, followed by a +10.5% rebound in 2022. Unemployment stood at approximately 8% in 2024, signaling underlying fragility in the labour market. These factors, combined with geographic isolation and climate risks, amplify the vulnerability of disadvantaged households in the outer islands.

Private Dwellings

There are 4681 private dwellings recorded in the 2021 Census with 1214 of those located in the *Pa Enua*. Table Two shows some of the selected characteristics of private dwellings in the Cook Islands¹⁶.

Table 2

Selected Characteristics of Private Dwellings in the Cook Islands

Location	Total Dwellings	Concrete Floor and Walls	Roofing Iron	Spouting (Partly or Fully)
Rarotonga	3467	1841	3299	2139
Rest of Southern Group	962	558	940	841
Northern Group	252	160	245	236
Totals	4681	2559	4484	3216

Concrete floors with cement block walls is the main construction type, but some houses still retain rock and limestone walls. This is normally combined with a roof made of iron, steel or aluminium.

All the Southern Group islands have some of the household water supply distributed through a reticulated system. Contrastingly, nearly all of the private dwellings in the Northern Group

¹⁴ CIG, 2024, pg 61.

¹⁵ Ibid, pg 61

¹⁶ CIG, 2021, Table 6.05, pg 146.

capture rainwater off aluminium, steel or iron roofing for storage in household water tanks.

Three to five roomed dwellings are the most common in the Cook Islands. Higher average household size was evident in the Northern Group islands at 4.3 persons but much lower in Rarotonga at 3.1 persons. For the *Pa Enua* overall, the average household size was 3.4 persons per private dwelling¹⁷.

In 2019 an updated Building Code was established with enabling building control legislation which prescribed the technical requirements to be satisfied in order to gain a building consent¹⁸. While upgrading the standards for buildings increases the resilience of new buildings, two aspects in particular reflect the impacts of climate change:

- Minimum acceptable floor levels to protect buildings from the risk of flooding and coastal inundation are specified.
- The design wind speed of the buildings is based on a Category Three cyclone. Associated with this, standards are also set for any temporary roof tie-downs for cyclones¹⁹.

CLIMATE CHANGE CONTEXT

Global Context

Human activity is causing a global warming of the atmosphere, ocean and land and this change is being experienced in every region and on every continent. Figure 4 Global Average Surface Temperature Relative To 1850-1900 shows the global average surface temperature relative to the 1850-1900 baseline. The average global temperature for 2011-2020 is 1.1°C above this baseline. Consequently, there is more evidence of changes in extremes of heatwaves, rainfall, droughts, and tropical cyclones being observed²⁰.

It also appears that the changes in global temperatures are occurring earlier than projected. The World Meteorological Organisation (WMO) has confirmed that 2024 was the warmest year on record. This means that we have just experienced a calendar year with a global mean temperature exceeding the 1.5°C threshold for the first time²¹.

When the global average warming is at a defined level, some regions of the world will show warming lower than this average, and some areas will be higher. The warming for the Pacific Islands is projected to be lower than the global average as warming is less over the ocean regions than over land²². Even within the Cook Islands, climate impacts will be variable as seen in the difference between the Northern and Southern Group average temperature in Figure 3. While the rate of warming may be slightly less, the severity of the climate impacts are also determined by the type of hazard, the exposure and the vulnerability of the country. Overall, this results in the Cook Islands being more vulnerable to the impacts of climate change than

¹⁷ CIG, 2021, From data in Table 16, pg 30.

¹⁸ CIG, 2019, pg 8. *Cook Islands Building Code*, Rarotonga, Cook Islands.

¹⁹ Ibid.

²⁰ IPCC 2023, pg 5. *Synthesis Report of the IPCC Sixth Assessment Report, Summary for Policymakers*.

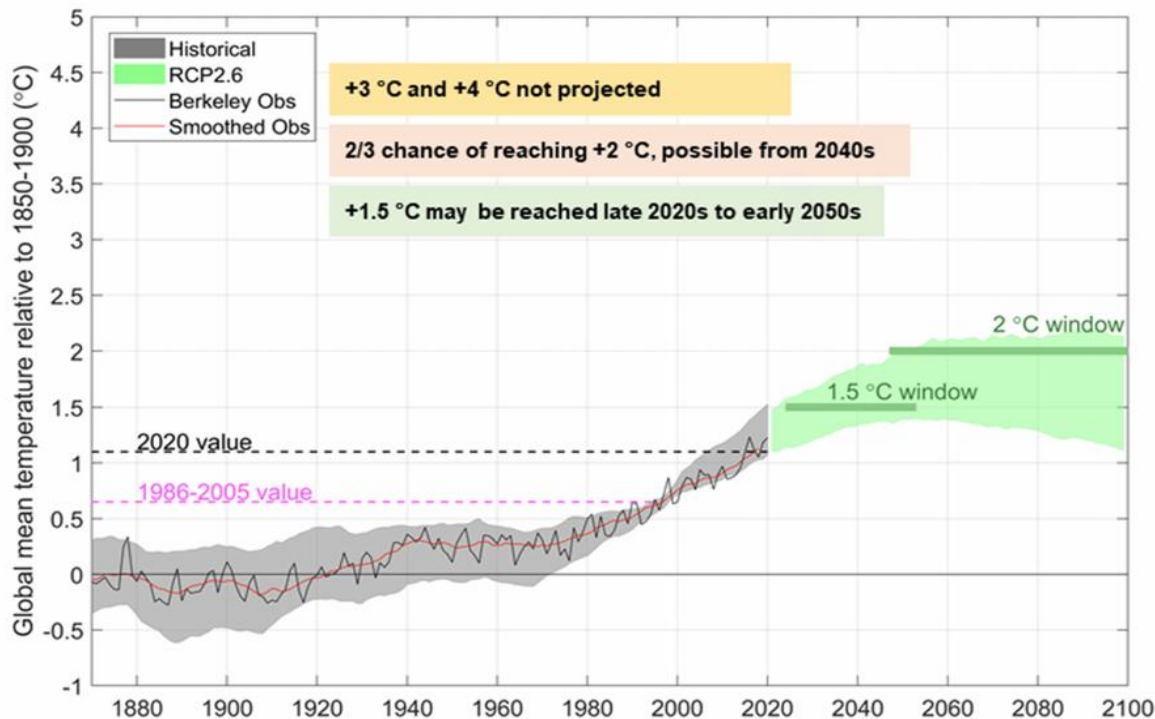
²¹ <https://wmo.int/news/media-centre/wmo-confirms-2024-warmest-year-record-about-155degc-above-pre-industrial-level>

²² CSIRO/SPREP, 2021, pg 14. *'NextGen' Projections for the Western Tropical Pacific: Current and Future Climate for Cook Islands*, Melbourne, Australia.

many other countries²³.

Climate change impacts on economic sectors such as agriculture, forestry, fisheries, and tourism are affecting individual livelihoods. Destruction of homes and infrastructure, loss of property and income, and food insecurity are just some of the impacts leading to adverse effects on gender and social equity²⁴. All these impacts are projected to intensify.

Figure 4
Global Average Surface Temperature Relative To 1850-1900²⁵



Cook Islands Context

In the Cook Islands, two of the main determinants for climate are associated with the movement of the South Pacific Convergence Zone (SPCZ), and how much the region around the equator becomes hotter and wetter²⁶. Despite the various climate change scenarios, there is still uncertainty around the direction of change of the SPCZ and the strength of the warming around the equator.

Figure 5: Standardised Scenarios for the Cook Islands for the Period 2040-2059 Relative to 1986-2005 for Low and High Emission Pathways and Two Climate Change Scenarios, describes a range of possible future changes in annual and seasonal rainfall, determined by what direction the SPCZ moves and by the strength of the warming along the equator²⁷. The

²³ Ibid, pg 14.

²⁴ IPCC, 2023, pg 6

²⁵ CSIRO/SPREP 2021, pg 13.

²⁶ Ibid, pg 27.

²⁷ Ibid, pg 26.

changes are based on two scenarios: a low emissions pathway and a high emissions pathway and by utilizing these factors, a projection is given for some climate change impacts.

While changes in annual rainfall are equivocal, other impacts are consistent across all four projected outcomes:

- annual temperatures will continue to rise,
- sea level will continue to rise,
- there will be more heatwaves,
- there will be heavier rainfall events, and
- there will be greater tropical cyclone impacts.

For cyclones, the greater impacts are expected because of an increased intensity of cyclones combined with sea level rise and increased rainfall rates. This may be associated with less frequency of cyclones in the Southwestern Pacific²⁸.

Figure 5
Standardised Scenarios for the Cook Islands for the Period 2040-2059 Relative to 1986-2005 for Low and High Emission Pathways and Two Climate Change Scenarios

	Scenario 1* SPCZ moves south Lower equatorial warming	Scenario 2* SPCZ moves north Higher equatorial warming
Low emissions (RCP2.6)	Warmer & drier • Annual temperature: +0.5°C • Annual rainfall: -10 to -15% • More heatwaves • Less humidity • More solar radiation • Heavier rainfall events • Greater tropical cyclone impacts • Sea level rise: 16-29 cm	Much warmer & wetter • Annual temperature: +1.0°C • Annual rainfall: +10 to +15% • More heatwaves • More humidity • Less solar radiation • Much heavier rainfall events • Greater tropical cyclone impacts • Sea level rise: 16-29 cm
High emissions (RCP8.5)	Much warmer & drier • Annual temperature: +1.0°C • Annual rainfall: -15 to -20% • More heatwaves • Less humidity • More solar radiation • Heavier rainfall events • Greater tropical cyclone impacts • Sea level rise: 19-36 cm	Hotter & much wetter • Annual temperature: +1.7°C • Annual rainfall: +15% • Many more heatwaves • More humidity • Less solar radiation • Much heavier rainfall events • Greater tropical cyclone impacts • Sea level rise: 19-36 cm

²⁸ Ibid, pg 20.

THE PROBLEM

The most marginalized or disadvantaged people in our societies are also often the most vulnerable to the impacts of climate change. The term “disadvantaged” in this document refers to segments of the population that experience greater obstacles to success or to access for resources, services, and opportunities due to various systemic factors. These obstacles may arise from economic, social, or structural inequalities, such as poverty, discrimination, lack of education, or social exclusion²⁹. While this is not an exclusive definition, in the Cook Islands the disadvantaged groups are most often defined by disability, age and income-level.

Families living in the *Pa Enua* face compounded climate risks and constraints, including lower incomes, higher freight and construction costs, and reduced access to services. Connectivity is reduced as ports and harbours are more exposed and communication links are more tenuous. Without targeted support, escalating cyclone intensity, sea-level rise, and heatwaves will widen inequities and erode wellbeing.

Table 3: Resident Population 15 Years And Over By An Income Level, shows the percentage of the resident population 15 years and over who earn less than NZ\$20,000 per annum. By combining the Northern and Southern Group totals, this highlights that 87% of workers over the age of 15 in the *Pa Enua* are earning less than NZ\$20,000 annually. The figure for Rarotonga is 61%.

Table 3

*Resident Population 15 Years And Over By An Income Level*³⁰

Location	Total Workers 15 Years and Over	Earning Less than NZ\$20,000 p/a	Percentage
Rarotonga	8328	5082	61%
Southern Group	2214	1901	86%
Northern Group	677	622	92%

All of our communities are being impacted by climate change, but the disadvantaged families living in the *Pa Enua* are some of the most at risk and vulnerable to climate change. More intense storm events and cyclones, sea level rise, rising temperatures and more periods of extreme heat are only some of the impacts that these families are facing and will continue to face.

For the purposes of this project we have identified the disadvantaged as the target group for support. They are defined by:

- annual household income below US\$24,000,

²⁹ <https://oxford-review.com/disadvantaged-groups-definition-and-explanation>

³⁰ CIG, 2021, From data in Table 4.03, pg. 110.

- being over 60 years of age,
- having a disability or physical mobility issues
- having health issues that can be ameliorated by internalising bath and toilet facilities

Further to that, they must be resident in the *Pa Enua* and have a home capable of being upgraded.

The annual household income threshold is based on the average household number in the *Pa Enua* containing two adults and one child. If the two adults are earning the Cook Islands minimum wage, their combined annual income will be NZ\$38,220. The child benefit for one child is NZ\$1500 per annum which will rise to NZ\$1800 in 2027.

If we use the 2027 child benefit figure that will make the annual household income for two minimum wage earners NZ\$40,020. At current exchange rates that figure equates to US\$24,000.

While this is based on an average household figure, the reality is that many of the disadvantaged families in the *Pa Enua* will have more than three people living in the household, as shown in the Aitutaki case study. Or the income for the household is significantly lower than the minimum wage as described in the Mitiaro case study.

This project entitled *Increasing the Resilience of Disadvantaged Communities in the Cook Islands* (DCCI) will provide more targeted support to enable these disadvantaged groups to make their homes more resilient and reduce their vulnerability to climate change. The Building Code 2019 will provide the standards for the assessment of the renovation work and the project will complement the recently approved Green Climate Fund (GCF) project, *Direct Financing for Communities and Businesses to Respond to Climate Change in the Cook Islands* (EDA)³¹.

One of the aims of the EDA project is to provide funding assistance to approximately 50% of the identified dwellings across the country where disadvantaged families are residing³². By coordinating the DCCI with the EDA implementation, the aim is to be able to provide assistance to 100% of those dwellings in the *Pa Enua*.

PROJECT OBJECTIVES

BUILDING RESILIENCE WITH INCLUSIVITY

The overall goal of DCCI is to increase the resilience of families in the *Pa Enua* and of disadvantaged communities in the Cook Islands by adopting a locally-led approach that empowers island communities to lead climate adaptation. This project will achieve the goal by building the capacity for climate change decision-making in the outer islands, devolving the consideration of applications and allocation of funding, and supporting local resources to implement the project through transparent and inclusive governance structures.

³¹ FP281, 2025. <https://www.greenclimate.fund/project/fp281>

³² This is Tier One in the EDA.

One of the principles of the Adaptation Fund (AF) is to address structural inequalities faced by various marginalized groups and to encourage vulnerable and marginalised individuals to meaningfully participate in and lead adaptation decisions³³. The IPCC also recognizes that adaptation and mitigation actions that prioritise equity and inclusivity lead to more sustainable outcomes, support transformative change and advance climate resilient development³⁴.

At the national level, a goal of the Cook Islands Climate Change Policy is to strengthen resilience to the impacts of climate change through a coordinated, inclusive, and culturally appropriate adaptation programme³⁵. Some of the aspects of being inclusive in the Cook Islands approach to climate change are actioned by ensuring that adaptation activities are designed to and implemented for the disadvantaged groups within our society.

THEORY OF CHANGE

Figure 6 Theory of Change diagram below describes the process that will achieve the overall goal of the DCCI project.

Assumptions

There are some overriding assumptions that support the theory of change.

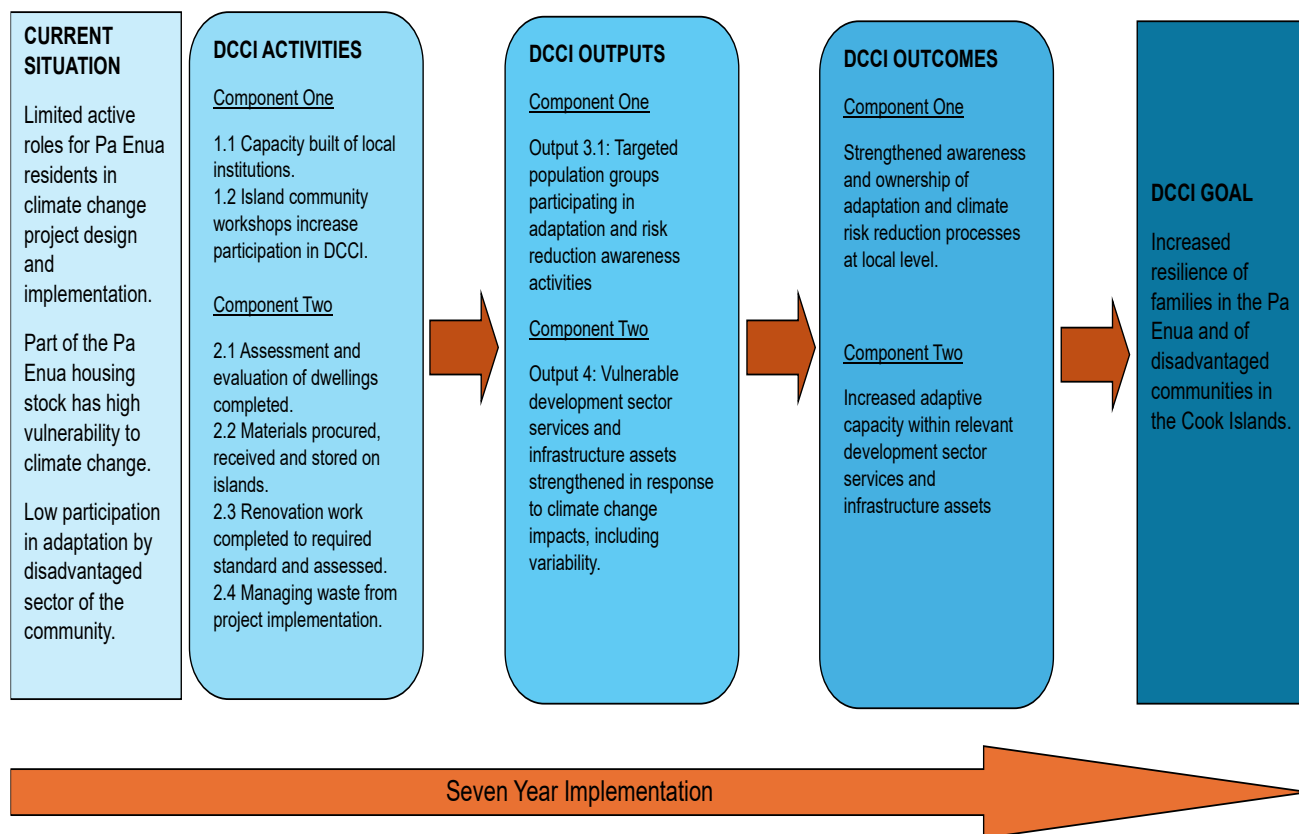
- If the proposal is approved by the AF Board, then funding availability over the seven-year term of the project will be received in a timely manner.
- The identified risks will be able to be managed and mitigated to minimize the impact on the project.
- There will be no *force majeure* events such as cyclones or wars that will impact on implementation.
- The Cook Islands Government (CIG) continues to support the implementation of the project through the central agencies.

³³ AF 2024, pg 3. *Additional Delivery Modalities For Expanding Support To Locally Led Adaptation*, Board Paper, AFB/PPRC.33/39.

³⁴ IPCC, 2023, pg 31.

³⁵ OPM, 2018, pg 7. *Cook Islands Climate Change Policy 2018-28*, Office of the Prime Minister, Rarotonga, Cook Islands.

Figure 6
Theory of Change



PROJECT COMPONENTS AND FINANCING

There are two components to the DCCI project under which the activities will be organized. More details are given below in Part II-A.

Component One, *Capacity Building and Awareness Raising of Island Communities* will begin the project and through the workshops and training, ensure that the community is enabled and prepared for the renovation work to be implemented. Component Two, *Increasing the Resilience of Pa Enua Homes* will include all of the stages of carrying out the renovation work. Managing the building waste generated by the project will also be effected by an activity under this component.

Table 4
Project Components

Project Components	Expected Concrete Outputs	Expected Outcomes	Amount (US\$)
1.Capacity Building and Awareness Raising of Island Communities	1.1 Capacity Built of local institutions involved in DCCI.	1. Increasing the capability of island communities to manage their adaptation projects	\$180,500
	1.2 Island community workshops increase participation in DCCI.	2. Strengthened awareness and ownership of adaptation and climate risk reduction processes at local level	\$118,000
2. Increasing the Resilience of Pa Enua Homes.	2.1 Assessment and evaluation of dwellings completed.	1. Houses assessed and applications completed.	\$280,000
	2.2 Materials procured received and stored on islands.	2. Local institutional capabilities built and increased community participation in project implementation.	\$3,681,000
	2.3 Renovation work completed to required standard and assessed.	3. Individuals and Families are less vulnerable to the impacts of climate change	\$166,500
	2.4 Managing Waste from project implementation	4. Preventing adverse impacts of pollution from project waste	\$131,000
3. Project/Programme Execution cost (2.94%)			\$ 134,000
4. Total Project/Programme Cost			\$4,691,000
5. Project/Programme Cycle Management Fee charged by the Implementing Entity (if applicable) (6.58%)			\$ 308,500
Amount of Financing Requested			\$4,999,500

PROJECTED CALENDAR:

The Milestones for the project are based on a submission to the Adaptation Fund Board at the October 2026 Meeting. If approval is received from a later Board meeting then the milestone dates will be amended.

Based on an October 2026 consideration by the AF Board, the date for signing the Funding Agreement has been scheduled to be December 2026. Assuming that the first disbursement is received in January 2027, the inception workshop is planned for April 2027. Table 5: Project Milestones and Due Dates sets out the proposed schedule.

Table 5

Project Milestones and Due Dates

Milestones	Expected Dates
Start of Project Implementation	April 2027
Mid-term Review	October 2030
Project Closing	April 2034
Terminal Evaluation	July 2034

PART II: PROJECT / PROGRAMME JUSTIFICATION

A. PROJECT COMPONENTS

There are two components to the DCCI project. Component One focusses on capacity building and awareness raising of the island communities that will be at the heart of the implementation of the project. Component Two is based on the renovation activities that will increase the resilience of the homes of the disadvantaged families.

COMPONENT ONE

Under Component One, each of the islands in the *Pa Enua* will have a workshop which will be conducted in two parts. The first part (Activity 1.1) will build the capacity of key participants in the implementation of the project. Participants will include the climate change Focal Points, Island Government (IG) staff, Ministry of Internal Affairs (MIA) staff, and other CIG agencies involved on each island.

The first part of the workshop will discuss each step in the process of implementing the project. The participants will discuss the initial on-island awareness raising, proposal writing, assessment of buildings, decision-making and recommendations by the Island Government. This will be followed by looking at how the procurement of materials, shipping and storage and the commencement of renovations will be carried out. As the project is implemented, there will be monitoring, evaluation and learnings, which will be part of the reporting requirements. Each agency's responsibilities in these areas will also be discussed.

The outcome of these workshops will be that each agency will be aware of not just their role but how the input of every agency will contribute to the successful implementation of the project on their island. Within the structure of the overall project, each island will be making decisions on where the funding is allocated and how the activities will be implemented.

The second part of the workshop (Activity 1.2) will bring in the community on each island and focus on climate impacts, planned climate change activities, and proposal writing. Non-government organisations, village groups, private sector groups and faith-based organisations, will have specific outreach approaches to encourage participation.

Beginning with a more general awareness raising of global climate change impacts the second workshop will progress through regional and national issues to consideration of specific island impacts and potential responses. The proposal writing during this part of the workshops will be tailored towards the DCCI project and will also introduce the upcoming EDA project.

Some of the people that will be assisted with funding may not be able to participate in the community workshops. Discussions will be held with the participants at the community workshops to identify these people. The climate change Focal Point (CFP) will then conduct visits to begin the engagement and prepare those families for the activation of Component Two of the DCCI.

COMPONENT TWO

The completion of the activities under Component One will set the scene for the implementation of the renovation activities under Component Two. The implementation will begin with the call for proposals from households interested in applying. Promotional materials will be developed and deployed through various avenues to promote the project and this will be supported on each island by the CFP.

As applications are received, assessment and evaluation of dwellings that may qualify for renovation will be undertaken (Activity 2.1). The team that will carry this out is described below in Part Three.

Each *Pa Enua* island team will compile a long-list for consideration by their Island Government (IG). The list will identify the houses that meet the selection criteria and provide an initial estimate of cost³⁶. If required, the IG will also assign a prioritization. Once approved by the IG, the list will then be sent to Rarotonga for processing.

The next step will be the procurement of contractors and materials, shipping from Rarotonga, and storage on each island (Activity 2.2). Cook Islands Government processes will be followed for the procurement of goods and services and this will be overseen by the PMU team for the DCCI project.

Once the materials are received on each island, the renovation work will be undertaken (Activity 2.3). This activity will be managed and monitored by a Contract Activity Manager (CAM), the Climate Change Cook Islands (CCCI) Focal Point and an IG representative. On-island contractors will be utilised as much as possible and can be supplemented from Rarotonga if required.

None of the *Pa Enua* islands have waste processing facilities and managing this waste-stream will be necessary. The waste will be sorted on each island, and the plastic and metals will be removed for processing in Rarotonga (Activity 2.4).

INCREASING CLIMATE RESILIENCE

The *raison d'être* for the Locally-Led Adaptation (LLA) funding modality is based on devolved decision-making for and facilitating direct access to climate finance for communities. However, simply including these aspects in a project's implementation structure is not enough. Communities must be enabled by awareness-raising, upskilling and bespoke project design that will support their participation in locally-led adaptation responses. This is a necessary precursor if devolved decision-making and direct access to climate finance is going to be beneficial and increase resilience in the targeted communities.

The activities under Component One are aimed at preparing the *Pa Enua* island communities to be the agents of change on their islands. Building the capacity of the institutions, making the community more knowledgeable about the impacts of climate change, and giving them the

³⁶ More information on the eligibility criteria is included in Part III-A

tools to access climate finance will all contribute to increasing their resilience to climate change.

Those same institutions and individuals will then be directly involved in the implementation of the renovation of homes on their island. Component Two will make the dwellings of disadvantaged communities on each island more resilient to the impacts of climate change which flows onto making the individuals and families who live in those houses less vulnerable to the impacts of climate change.

The scope of the work to be funded under the DCCI project will include:

- Re-roofing
- Roof Tie-downs
- Windows and Shutters
- Accessibility including internalising toilet and bathroom
- Septic tank repair
- Spouting and Water tanks.

Table 6: Responding to Climate Impacts shows the link between the projected climate change impacts identified in Part One and the proposed renovation work.

Table 6

Responding to Climate Impacts

Climate Change Impacts	Work Scope
More severe cyclones and storm events	Re-roofing, Tie-downs, Windows and Shutters
Increasing daytime temperatures, more heatwaves, Longer drought periods	Re-roofing, Spouting and water tanks.
Increasing daytime temperatures, more heatwaves	Re-roofing, Internalising toilet,
More severe cyclones and storm events	Internalising bathroom
Longer drought periods, more severe storm events and flooding	Accessibility through ramps and supports
Sea-level rise, more severe storm events and flooding	Septic tank repair.

B. BENEFITS AND IMPACTS

The focus for the activities to be implemented under the DCCI project is the disadvantaged communities in the outer islands of the Cook Islands. This group includes women, men, elderly, youth, children, and people with disabilities. Resilience to climate change varies across this group according to their particular circumstances and their disadvantage makes them more

vulnerable to the impacts of climate change. Low household income levels also cuts across these groups. The benefits for them and potential negative impacts of implementing this project are discussed below.

Aitutaki Case Study

In Aitutaki a family of seven live together in a house partially made of concrete block and partially made of timber and fibrolite walls. An elderly woman, her son, her daughter and son-in-law, and their three children share the residence. Two of the adults have mental health issues.

The elderly woman is on a Cook Islands pension. The two men are both on part-time employment, and her daughter is a stay-at-home mother. The daughter receives three child benefits from MIA which contribute to a total annual income for the family of US\$22,000.

They catch water off half of the roof and are currently receiving a Special Assistance Fund (SAF) grant to renovate some space inside to fit a toilet and a shower stall (photo below). The house is not weather-proof and the inside gets damp in severe storms.

This household would meet the eligibility criteria but would need assistance to complete an application. With the assistance of the DCCI and EDA grants, this family could improve their water catchment and storage, upgrade their windows, and tie-down their roof.

Figure 7

Home on Aitutaki



ECONOMIC BENEFITS

The households included in our target group have very low income levels. Some households are purely dependent on CIG pensions and allowances³⁷. This limits the ability of these

³⁷ For ages 60-69 a payment of \$250 is paid out on the 1st and the 16th of each month. For ages 70+ a payment of \$350 is paid out on the 1st and the 16th of each month. This is a taxable income.

households to carry out needed upgrades of their homes that will make them less vulnerable to the impacts of climate change.

With a low level of income, these families prioritize daily needs over other expenditure and cannot take on debt-financing through a loan to renovate their homes. Added to this, commercial banks in Rarotonga will not give loans to a person over 60 years of age without another co-signor who is under the age of 60. By assisting these households with a grant to carry out the renovation work, the individuals will be able to increase their resilience without taking on a debt burden that they cannot sustain.

It has been estimated that for residential buildings built prior to 2019 to be fully compliant with climate adaptation components of the Building Code 2019, funding of approximately USD28,500 is required³⁸. By coordinating the implementation of this project with the GCF funded EDA project we are able to increase the amount of funding that will be available for the identified households. This expands the type and level of renovation that can be undertaken, increasing their levels of resilience and broadening the economic benefits.

Table 7
Funding Availability Per Household

Source	Item	Amount (USD)	Note
GCF-EDA	Funding	\$12,523.00	100% grant for Tier One or “most vulnerable”
AF-LLA	Funding	\$ 8,100.00	Based on 430 households
CIG	In-kind		Agency support
TOTAL		US\$20,623.00	

If they have not already accessed the Special Assistance Fund (SAF), families may also be eligible to top up the amount of funding by up to US\$6000.

Being able to fill in an application for funding is quite often beyond many families in the Cook Islands. Unfamiliarity with the language used, and understanding what information is required are some of the barriers. The upskilling work to be done through the conducting of the workshops on each island and the proposal writing, will improve the ability of those families to apply for assistance under this project and for other funding opportunities in the future.

The first source for labour to carry out the project work will be the builders on each island. Their employment means increased economic sufficiency for these rural areas. If required, this workforce may be supplemented from Rarotonga, which will see the funding flow through to accommodators, transport and food services on each island.

³⁸ FP281, 2025, Pg 27.

More broadly, there will also be a trickle-down economic effect for the Cook Islands economy in the same areas. Travel to the *Pa Enua*, shipping of materials and employment of people will provide wider economic benefits.

Mitiaro Case Study

An elderly couple are living by themselves in Mitiaro. They are living in their own home, which was never finished off completely and fitted out. Their only income is from a Cook Islands pension which they both receive. They are able to supplement their income with sales of surplus produce from their home garden.

The couple have successfully applied to the SAF for assistance to upgrade an external bathroom and toilet. However, there is major renovation work still required on other parts of their home.

Figure 8

Home on Mitiaro



The photo on the left shows the weakened condition of the rafters and beams supporting the roof. The centre photo shows a window cavity that the window has rotted out of and not been replaced. The photo on the right shows the front of the upgraded external bathroom and the lack of an adequate accessway.

The couple are highly vulnerable to storm events which cause flooding at the rear of their house. This can limit their ability to access their toilet and shower. Strong rain also penetrates the house through the boarded-up window areas and under the roof. On hot days there is little airflow through the house because of the boarded-up window spaces.

For this couple, the funding assistance through the DCCI, along with the EDA Tier One support, will enable them to improve aspects of their home which will immediately reduce their vulnerability to climate change impacts.

SOCIAL AND ENVIRONMENTAL BENEFITS

Increasing the resilience of their homes has a resultant improvement of the living conditions for families which increases the likelihood that those families will stay on the island. This combats the drift to national centres and internationally and makes the island communities more sustainable.

Improving their living conditions enables families to remain together. Families will also feel safer, particularly during severe weather events. Both of these outcomes build social cohesion within the family and within the community.

Making infrastructure such as houses more resilient, means that they can better withstand the destructive impacts of severe weather such as cyclones. The aftermath of these events has an environmental impact through damage caused by the event and also a psychological impact through damage to homes and livelihoods. Reducing those impacts creates a visible benefit environmentally and a less visible psychological benefit.

In March 2025, the Ministry of Internal Affairs conducted a survey to collect data on vulnerable families across Rarotonga and the *Pa Enua*. They identified 371 households in the *Pa Enua* with 1317 individuals living as part of those households. Of those households, female residents numbered 639 and male residents numbered 678.

POTENTIAL NEGATIVE IMPACTS

The screening against the 15 principles of the Adaptation Fund has been conducted and included in Part II-K below. The potential negative impacts foreseen at the time of drafting the proposal are related to project implementation rather than possible negative outcomes. These are the potential disruption to families during the renovations and the waste stream that will be generated by the renovation work on homes.

Both of these potential impacts can be managed through monitoring and risk mitigation. How these are managed will be discussed further in Part III-C.

C. COST EFFECTIVENESS

The Cook Islands has an approved GCF project about to begin. The GCF project uses an approach to implementation that will be similar to that utilized under this LLA proposal with decision-making and implementation driven largely by the communities in the *Pa Enua*. The CCCI is an executing entity for the GCF project with the responsibility for implementing the activity that supports the disadvantaged on Rarotonga and in our outer-island communities (Tier One).

As described previously, coordinating the implementation of the GCF project with the DCCI, enables a significant increase in the total funding assistance available for each identified family. From the perspective of those families, it is a much more cost-effective use of their time and resources to participate in the DCCI and the EDA at the same time with consequent increased upgrading of their homes.

COMPLEMENTARITY

With Climate Change Cook Islands as the main executing entity for the DCCI, and also one of the executing entities for the EDA project, it creates the opportunity to achieve significant cost effectiveness in implementation.

Application

The households on each island that wish to participate in the DCCI will only have to fill out one application form and go through one review process but if it is approved, the household will receive assistance from a combined funding pool. The participants in Activity 1.2 will gain some experience in completing an application form and each household will receive assistance from the CFP as well. This is a benefit for the households who sometimes have difficulty filling out funding applications.

Technical Assistance

The assessment of the scope of work for each household will be carried out by inspectors who have been trained as part of the capacity-building activities of the EDA. The inspections, however, will be utilised for funding applications under the DCCI and the EDA. This saves on the DCCI having to include a similar upskilling activity and cost, to be able to implement the project.

Decision-making

The devolved decision-making process will involve the Island Governments only evaluating one application and considering one scope of work per household. By coordinating the implementation of the DCCI with the EDA, this results in less time being required from the local government and increased efficiency. On Rarotonga the evaluation process will be simultaneous for both projects, saving on cost and effort by not duplicating the steps needed for endorsement.

Procurement

Material requirements will be grouped and purchased by island enabling discounted pricing for bulk purchases and shipping. This increases the purchasing power of the funds in the DCCI and the scope of work that can be completed per household.

Renovation Work

The scheduling of the work will also be coordinated on an island basis for both the GCF and AF projects leading to greater efficiencies in utilizing the labour pool on each island.

Alternative Options

The scope and implementation approach for the DCCI is based on coordination with a component of a much larger project. The EDA will be supporting a range of sectors within the Cook Islands community: businesses, Non-government Organisations (NGO), community organisations and individual families. The DCCI will be supporting only one group which is the disadvantaged families living in the *Pa Enua*.

The only alternative would be for the DCCI project to be implemented as a stand-alone project. This would bring more implementation costs into the project and significantly reduce the pool of funds available for the renovation work.

Sustainability

Being able to increase the amount of work that can be done to support the individual households also increases the overall sustainability of the DCCI project post-implementation. Families will be able to address more of their climate change vulnerabilities at the same time and completing these renovations will result in more families remaining in their residence for longer.

Applying knowledge management techniques during the implementation of the DCCI will also support the sustainability of the DCCI. Using learning loops to update the knowledge base of the participating agencies will enable better support for the families concerned.

D. NATIONAL DEVELOPMENT STRATEGIES

While the climate change focus of this project is to increase the resilience of disadvantaged communities in the Cook Islands, it reflects a broader approach to sustainable development that is based on inclusivity.

NATIONAL SUSTAINABLE DEVELOPMENT AGENDA

The overarching sustainable development policy document for the Cook Islands is the National Sustainable Development Agenda 2021-2121 (NSDA 2020+)³⁹. The NSDA sets out a broad 100-year timeframe which is broken down into four 25-year blocks. These are in turn supported by five-year plans, the first of which has just finished for the period 2021-2025 inclusive.

The NSDA 2020+ is the high-level planning document which sets out the Cook Islands national development guidelines and establishes 15 development goals, with 72 indicators to measure progress towards achieving those goals. These indicators are aligned to commonly identifiable sectors and together with the goals they represent a holistic, objective scorecard for the sustainable development of the country.

The NSDA 2020+ emphasizes the quality of life for the people of the Cook Islands and puts the wellbeing of the people at the centre. It is a national planning document but is also linked to the international global Sustainable Development Goals (SDG 2030) and the regional agenda Small Island Developing States Accelerated Modalities of Action (SAMOA pathway).

Table 8: Project Alignment with NSDA Goals illustrates the crosscutting nature of Climate Change impacts and how the activities under the DCCI project will support achieving six of the 15 goals of the NSDA 2020+.

³⁹ CIG, 2021a. *Te Ara Akapapa'anga Nui, National Sustainable Development Agenda 2021–2121*, Central Policy and Planning Office, Office of the Prime Minister, Cook Islands.

Table 8***Project Alignment with NSDA Goals***

NSDA 2020+ Goals	NSDA Goal Descriptor	Project Activity
Goal One – Well Being for All	Looking after our parents and children, youth and elderly.	All the house renovations
Goal Five – Water and Sanitation	Improve access to sufficient and safe water and improve management of sanitation.	Improved household water catchment and storage, improved septic tanks.
Goal Nine - Our Inclusiveness	Improve care of the infirm, elderly and disabled.	All the house renovations
Goal Eleven - Our Biodiversity and Natural Environment	Improve lagoon water quality.	Improved septic tanks reduces septic tank seepage into lagoons
Goal Twelve - Climate Change, Resilience, Renewable Energy and Energy efficiency	Promote resilient communities and enhance protection from cyclones.	All the house renovations
Goal Fourteen - A Sustainable Population	Increase economic engagement of Cook Islanders.	Local communities employed.

ECONOMIC DEVELOPMENT STRATEGY

The Economic Development Strategy 2030 (EDS) is the overarching economic roadmap for the Cook Islands and is consistent with the NSDA 2020+. The EDS focusses on addressing cross-cutting economic issues, and provides a cohesive structure to help guide economic decision-making over the medium and long-term. The EDS aims to provide the economic and fiscal foundation for the National Sustainable Development Agenda 2020+⁴⁰. The EDS has five key objectives:

- improving equity and access for all;
- transforming the economy;
- developing our people and culture;
- investing in our Islands; and
- greening our economy.

Under the objective of improving equity, it is recognized that sustainable development requires economic growth strategies that consider both access to economic opportunities, and access to the basic services that enable opportunities to be exploited⁴¹. Consequently, one of the

⁴⁰ MFEM, 2021, pg 16. *Cook Islands Economic Development Strategy 2030*, MFEM, Rarotonga, Cook Islands.

⁴¹ Ibid, pg 26.

action items described in the EDS is to ensure we have an efficient and effective welfare system that fully meets the needs of the most disadvantaged members of our community.

COOK ISLANDS CLIMATE CHANGE POLICY

Policy statements are also required to enable linkages between the NSDA goals and sector outputs and activities. The Cook Islands Climate Change Policy 2018-28 was designed to facilitate the climate change sector linkages to the NSDA 2020+ and to enable mainstreaming of Climate Change into other sector policies and plans.

The Climate Change Policy established three national goals in the climate change area:

1. To contribute to the sustainable development of the Cook Islands.
2. To strengthen resilience to the impacts of climate change through a coordinated, inclusive, culturally-appropriate adaptation and mitigation programme.
3. To work collaboratively in climate change activities domestically and internationally.

For Goal Two, some of the aspects of being inclusive in the Cook Islands approach to climate change are actioned by ensuring that adaptation activities are designed with and implemented for the disadvantaged groups within our society. This is specifically supported by one of the guiding principles of the Climate Change Policy:

The Cook Islands national response acknowledges that climate change can impact differentially on the various sectors of society, recognises that there is a broad spectrum of interests, and commits to working in an inclusive and integrated manner to ensure equity in the planning, participation and outcomes of activities⁴².

With the same intent, the Cook Islands National Policy on Gender Equality and Women's Empowerment 2019-2024 has a guiding principle on inclusiveness which recognizes ... *the unique challenges and opportunities exist for diverse people of different genders, location, age, physical abilities, and ethnicity, treating each person with fairness and compassion⁴³.*

The DCCI is a project focused on increasing resilience to the impacts of climate change, but its implementation will be the pathway that will enable the Cook Islands to enact and achieve wider-ranging goals around inclusivity and fairness.

E. NATIONAL TECHNICAL STANDARDS

The Cook Islands Building Code 2019 (BC) sets the design and construction standards for all new builds in the Cook Islands. The previous building code was established in 1990 and those standards have been significantly updated. The majority of the standards are the latest versions of similar New Zealand standards reflecting that the major source of materials

⁴² OPM, 2018a, pg 11. *Cook Islands Climate Change Country Programme 2018-2028*, Office of the Prime Minister, Rarotonga, Cook Islands.

⁴³ MIA 2019, pg 13. *National Policy on Gender Equality and Women's Empowerment and Action Plan 2019 – 2024*, Ministry of Internal Affairs, Rarotonga, Cook Islands.

continues to be New Zealand⁴⁴.

As mentioned previously, the BC standards reflect the increased awareness of the impacts that Climate Change is having on dwellings. In particular, the DCCI renovation work will meet the guidelines and standards for:

- water supply plumbing,
- sanitary plumbing and drainage,
- septic tanks
- rainwater harvesting and storage
- roofing and roof tie-down
- windows and shutters
- pit latrines

The BC standards will also be applied for the technical requirements for the different materials to be used in the renovation work. This will ensure that high quality materials are supplied which are suitable for the environment that they will be in. This includes meeting the fire resistance levels for timber and walls.

BUILDING CONSENT PROCESS

The building consent process involves three agencies: the National Environment Service (NES), the Ministry of Health (MOH), and Infrastructure Cook Islands (ICI).

As a first step an applicant must submit an Environmental Significance Declaration to the NES. Once the declaration has been reviewed, and if no environmental concerns have been identified, an environmental permit will be issued. If there are any significant issues identified then follow up actions will be needed which may include an Environmental Impact Assessment (EIA).

Once approval of the building or development has been received from NES, the next stage is to submit an application to the MOH to review and approve the sanitation and sewage system design. The design must comply with health standards such as the Public Health (Sewage and Wastewater Treatment and Disposal) Regulations 2014, and the Public Health Act 2004.

The last stage is an application to ICI for final approval that the design complies with the Building Regulations and Cook Islands Building Code. If the ICI review is favourable, a Building Permit will be issued, allowing the applicant to begin the construction phase of the new building or development.

NATIONAL PROCUREMENT POLICY

There will be a significant amount of procurement for this project, both for contractors and for materials. The procurement activities will conform to the process set out in the Cook Islands Government Purchase and Sale of Goods and Services Policy⁴⁵.

⁴⁴ CIG, 2019, pg 8.

⁴⁵ CIG, 2024a. *Cook Islands Government Purchase and Sale of Goods and Services Policy*, Ministry of Finance and Economic Management, Rarotonga, Cook Islands.

This procurement policy is designed to ensure that the Crown conducts all sales and purchases in a uniform manner which is open, transparent and provides value for money for the Crown⁴⁶. The mandatory limits and approvals for all sales and purchases are described in Table 9: Cook Islands Government Sale and Purchase Approval Thresholds

Table 9

Cook Islands Government Sale and Purchase Approval Thresholds

Transaction Type	Estimate Cost / Sale Price	Specific Process
Purchases (Within Agency Budget)	\$200,000 and above	Tender with Head of Agency (HOA) and Tender Committee (TC) approval
	\$100,000 – \$199,999	Quotations with HOA and TC approval
	\$5,000 - \$99,999	Quotations with HOA approval

The procurement policy describes the steps for different types of purchases such as direct contracting, quotation-only and full tenders. Depending on how the purchases are packaged, it is highly likely that each procurement will exceed the NZ\$200,000 threshold. Accordingly, full tenders will be required and this process is set out in detail in the procurement policy.

The Ministry of Finance and Economic Management (MFEM) is the National Implementing Entity (NIE) for this project and the procurement section is located within one of the divisions at MFEM. They will be able to provide guidance and oversight as procurement is conducted throughout the project timespan.

ADAPTATION FUND ENVIRONMENTAL AND SOCIAL POLICY

A full assessment of compliance with the Adaptation Fund Environmental and Social Policy will be conducted further on in Part IIK. However, one of the principles is particularly relevant to this section on national technical standards.

Principle 1: Compliance With The Law.

From the outset, the procurement process will be fully compliant with CIG requirements. This ensures compliance with the law and through the open and transparent process encourages participation in the bidding process by suppliers.

⁴⁶ Ibid, pg 11.

All of the renovation work is aimed at upgrading existing houses and making them compliant with the climate resilience standards of the Building Code 2019. The consent process for the work involves environmental, and health and sanitation-based reviews. Qualified building inspectors will review progress during work and at completion to ensure that standards are maintained throughout the proposed implementation framework.

Building Capacity of Local Actors

The complementary EDA project, will be carrying out a component on capacity building utilizing the Cook Islands Tertiary Training Institute (CITTI). The CITTI will develop training materials to make tradespeople aware of the new requirements of the BC and of those aspects that increase the resilience of buildings to climate change impacts⁴⁷. The training comprises of theory and practical elements through classroom and on-the-job training and the classroom sessions can be substituted by online e-learning courses for self-study and reference⁴⁸.

Participants in the courses can be based in the *Pa Enua* and will use the knowledge gained to be part of the building gangs on their islands.

F. AVOIDING PROJECT DUPLICATION

The DCCI is a stand-alone project that will be implemented with funding support from the Adaptation Fund. It will have its own objectives, outcomes, outputs and indicators. Monitoring, evaluation, learning, and reporting will all be specific to the DCCI.

As the implementation of the DCCI begins, there will also be other initiatives that are being implemented with funding from separate donors but have a common goal of supporting the same disadvantaged communities.

GREEN CLIMATE FUND PROJECT

The DCCI will be coordinated with the GCF-funded EDA project which has a component supporting the disadvantaged in society who are also highly vulnerable to the impacts of climate change. Under the EDA the CCCI will have responsibility for the implementation of the activities which are providing the support to the disadvantaged families. This has been established under a Memorandum of Understanding (MOU) between the MFEM as the GCF Accredited Entity (AE) and the CCCI.

The available funding for that component from the GCF will be kept in a separate account from the rest of the EDA funding. This can then be accessed as required to support the DCCI implementation activities. The parties to the relationship for the implementation of the DCCI are the same as for the EDA, but the MFEM will be the NIE under the Adaptation Fund.

Table 10: Effectiveness and Efficiency shows that by combining the GCF funding with the AF funding, we can achieve synergies in effectiveness and efficiency that improves the implementation of both projects but more importantly, delivers better outcomes for the

⁴⁷ FP281, pg 38.

⁴⁸ Ibid.

communities and families involved.

Table 10
Effectiveness and Efficiency

Effectiveness	Families can build greater resilience with the increased funding.
	More activities strengthens economic resilience on each island.
Efficiency	One delivery of activities rather than two from separate projects.
	Sharing of service costs such as procurement and reporting.

SPECIAL ASSISTANCE FUND

The Ministry of Internal Affairs has established the Special Assistance Fund (SAF) to help improve the living condition of our most vulnerable citizens in the community. The SAF is targeted to assist Cook Islands pensioners, and infirm and destitute beneficiaries living alone where the only source of income is their pension or benefit. A maximum income threshold of NZ\$27,000 per household is also applied.

Other foreign pensioners may be eligible if they have been living continuously in the Cook Islands for five years prior to the application date and are not receiving any other income other than their pension. Individuals that have a health or physical condition that restrict their mobility may also be eligible. Approved recipients can re-apply every five years.

Approved applicants can receive:

- Up to \$10,000 for Outer Island residents receiving Cook Islands Pension, Infirm or Destitute Benefit
- Up to \$8,000 for Rarotonga residents receiving Cook Islands Pension, Infirm or Destitute Benefit
- Up to \$5,000 for Outer Island residents receiving foreign pension
- Up to \$4,000 for Rarotonga residents receiving foreign pension

Some of the families that will receive assistance under the DCCI may be within the five-year window of being unable to apply for the SAF. Other families that are eligible may seek to supplement the funding from the DCCI and EDA projects with assistance from the SAF. This decision will not impact their eligibility for the DCCI funding.

Table 11: Similar Projects shows three projects that are similar to the DCCI.

Table 11
Similar Projects

Fund	Focus	Value USD	Implementing Agency
EDA	Disadvantaged Household	\$12,500 per household	MFEM/CCCI
SAF	Disadvantaged Household	\$6,000 per household	Internal Affairs
NZ-CFF	Community	\$22,000 per community	CCCI

NEW ZEALAND FLEXIBLE FINANCE CLIMATE CHANGE FUND

Country Flexible Finance (CFF) is a part of New Zealand's NZ\$1.3 billion climate finance commitment. CFF is designed to be a funding mechanism that is partner-led and uses partner systems to allocate, manage and report on climate finance. The flexibility enables the funding to go direct to civil society groups and non-government organisations within a particular country.

The Cook Islands Climate Change office has used the CFF funding to work in the *Pa Enua* with communities to identify small scale projects that can be implemented immediately by the communities. With funding from the CFF of up to NZ\$40,000, these projects can be completed within 12 months of the initial workshop.

The Pa Enua communities select the climate change focus for their projects, but the difference to the DCCI is that the projects are not at a household level but at a community level. Most recently on Mauke, community water tanks were chosen as the focus for their project. While Mauke's project will be completed before the commencement of the DCCI, there may be occasions where another island's community chooses an area in common with the DCCI.

There will be opportunities to coordinate stakeholder engagements, gain efficiencies of staff placement and minimize the disruption to the island community. The CFF programme is ongoing and will be coordinated with the implementation of the DCCI.

COORDINATION

Once established, the Project Management Unit (PMU) for the DCCI will be responsible for the coordination of the DCCI with other similar projects such as the ones described above and any new projects that may emerge during the seven-year implementation period of the DCCI. The PMU will coordinate interaction with the MIA, MFEM, ICI, and the Island Government on each island.

The DCCI Monitoring and Evaluation (M&E) framework and the reporting structure that is established will allow for distinct reports to be prepared. It will also facilitate the adaptive

management that will be necessary for a project of this timespan. The reporting process is described in more detail in Part III-D.

G. KNOWLEDGE MANAGEMENT

PREVIOUS LESSONS LEARNED

The knowledge management for the DCCI does not begin once implementation starts but has already begun with the drafting of this proposal. The experience and lessons learned from previous climate change projects has been incorporated into the design of the DCCI. In particular, from the implementation and evaluation of the two previous AF projects in the Cook Islands: Strengthening the Resilience of our Islands and our Communities to Climate Change (SRIC-CC), and *Pa Enua* Action for Resilient Livelihoods (PEARL).

Both of these projects had a small grants activity for communities in the *Pa Enua* which were agriculture sector based. The terminal evaluation of the PEARL stated that the grants had proven effective in supporting grassroots communities and that they should be expanded to allow individual household applications⁴⁹. The report also noted the key role that on-island coordinators have in the implementation of projects in the *Pa Enua*⁵⁰. Both of these lessons learned are reflected in the design of the DCCI.

REPORTING

Figure 9: Project Reporting Flow describes the flow of information within the DCCI through the reporting process. The CAM on each island, with the endorsement of the IG will report to the PMU. The PMU will provide quarterly reports to the NIE and support the compiling of the annual report for the NIE to submit to the AF. The PMU will also facilitate the annual audit of the DCCI.

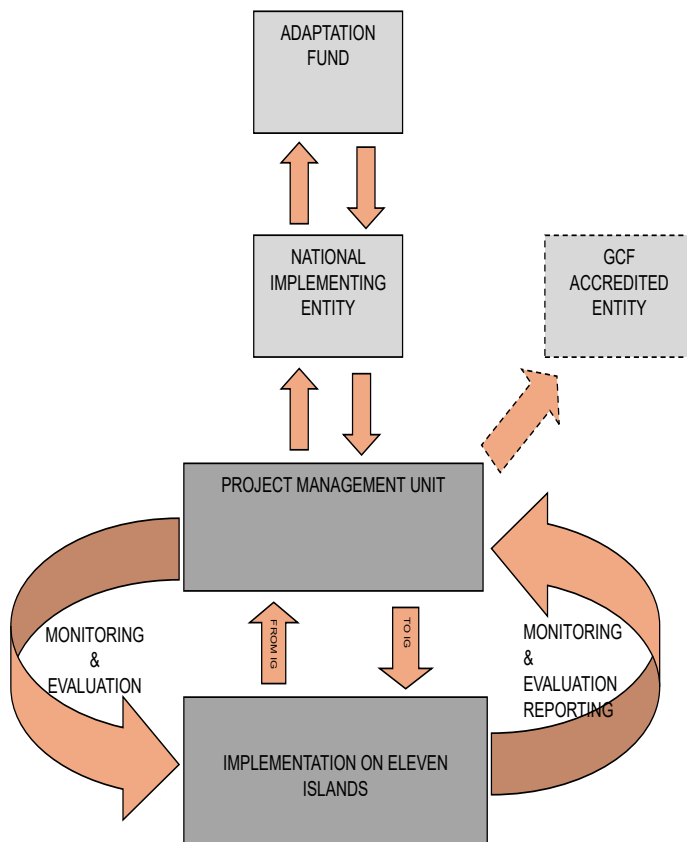
The internal reports will be formatted to reflect the requirements for the NIE reporting to the AF so that information can be easily transferred. Separately, the project implementation data relevant to the EDA will be provided to the AE for the purposes of their own reporting to the GCF.

The downward arrows in the diagram represent the feedback that will be provided on reports. The flow of information between the PMU and the individual islands will not only be related to reporting as this interchange will be the central part of the implementation of the project and the project monitoring framework.

⁴⁹ MFEM, 2024, pg 47. *PEARL Independent Terminal Evaluation*, Ministry of Finance and Economic Management, Rarotonga, Cook Islands.

⁵⁰ Ibid.

Figure 9
Project Reporting Flow



OTHER KNOWLEDGE FLOWS

As well as the island reports, M&E will also provide information that will feed into the adaptive management of the project. This may be through other sources of information such as verbal communications with islands, visits to islands, discussions with CIG agencies involved with the DCCI, and observations from other climate change project people visiting the island. Part III-D describes the M&E framework in more detail.

The capacity building workshops under Component One will be an important part of the knowledge management of the DCCI. The aim of the workshops is to increase the capability of the island communities to manage the projects on their island. As part of the workshops, they will be able to provide input to tailor the DCCI work programme to their specific needs, helping to achieve the objectives of an LLA project. The experience and knowledge will then be retained in the community to be used in future projects.

The EDA

The EDA project is providing assistance to several parts of the community: commercial premises, community halls and private homes. It has a grant that will also provide support to

the disadvantaged in the *Pa Enua*. As a result, the knowledge management within the EDA structure will overlap with that of the DCCI. Many of the same individuals will be involved with the two PMUs and both projects will benefit from lessons learned and experiences gained during implementation being shared in a timely manner.

KNOWLEDGE ACCESS

Documenting and storing lessons learned and best practices is a vital part of any programme. The Project Manager (PM) will be responsible for storing these in a separate register which will be part of the PMU records.

As the DCCI implementation proceeds, information gained can be used to update some of the CIG agencies databases. The MIA has a register of socio-economically vulnerable families, and many of these will have homes upgraded as part of the DCCI. The reports on that work can be used by MIA to update their register.

Emergency Management Cook Islands (EMCI) is an agency based at the OPM, and they are responsible for disaster response planning. As part of their work, EMCI keeps a database of the characteristics of every house in the Cook Islands. Some of the information from that database was utilized in the development of this proposal, and part of the knowledge management of the DCCI will involve feeding back into updating of the EMCI database. The information in the database integrates into an Island's disaster response plan, which will include being able to reach those who will need extra assistance to evacuate their home if it is required.

Island Governments will be included in the learning loops that are implemented. As part of the decision-making process they will receive all the applications from their island which will build their knowledge of the community on each island. As well, IGs will also be included on the distribution list to receive copies of the annual reports.

Public access to the information about the DCCI will be available on the CCCI website and social media outlets. This will be for communications on implementation progress along with publicity about upcoming work or events. Other aspects of the DCCI such as how to lodge an application or how to express a grievance can also be publicized.

H. STAKEHOLDER CONSULTATIONS

INITIAL SURVEY DATA

The initial stakeholder consultations began in March 2025, when the Ministry of Internal Affairs conducted a survey to collect data on socio-economically disadvantaged families across Rarotonga and the *Pa Enua*. The data was to support the development of the GCF funded EDA project and the families were identified from the MIA registry of vulnerable families⁵¹.

The survey was responded to by 721 people (354 females and 367 males), representing households that contained a total of 1923 people. Of the 721 responses, 371 were from people

⁵¹ The registry is of socio-economically vulnerable families as defined by the MIA.

based in the *Pa Enua*. The survey gathered information on household population, income, and construction. It also asked the responder to identify areas of their house that needed renovation. The survey form is attached as Annex One.

Based on the data from the survey, the MIA identified the highest priority for climate resilience support as:

- Low-income households with minimal income sources.
- Elderly individuals living alone, or those with physical or mobility limitations.
- Families with children living in destitute conditions.
- Households in the *Pa Enua*, where service access is more limited.

EDA CONSULTATIONS

Extensive multi-stakeholder consultations were undertaken across islands for the development of the EDA during 2024/25. On each island the meetings involved traditional leaders, community organizations, and local government. These meetings discussed the scope of the EDA components including the Tier One window which would be for the most disadvantaged.

Particularly relevant for the DCCI was the Pa Enua Forum meeting in July 2025. Approximately 40 participants from all the *Pa Enua* islands including Mayors and Executive Officers⁵² (EO) as well as government stakeholders were in attendance. Along with other CCCI projects, the participants were consulted on the proposed EDA and advised of the upcoming AF proposal.

The favourable response by all the *Pa Enua* representatives was based on an appreciation of the direct impact the EDA activities will have on their respective communities. Some comments were made on the cap per applicant as well as the scope of eligible activities and these have been taken into account in the design of the DCCI.

COMMUNITY CONSULTATIONS

During pre-planning for this project in the CCCI office, the area of focus for activities was refined to be only the *Pa Enua* and excluded Rarotonga. The communities on each island had already been consulted on the Tier One access to funding as part of the EDA engagements and were therefore familiar with the rationale of supporting the disadvantaged.

To strengthen the understanding, a series of consultations and stakeholder engagements have been conducted with the focus only on the *Pa Enua* communities and becoming more island specific in the engagement. Table 12: Pa Enua Stakeholder Consultations by Island shows the location, date and number of people consulted during the visits to the *Pa Enua* islands. Visits were conducted to Mauke and Aitutaki in October and November of 2025. Meetings were held on Mitiaro and Atiu in early 2026.

⁵² The Mayor leads the elected local government on each island while the Executive Officer is in charge of all the workers from the CIG agencies on the island.

Table 12*Pa Enua Stakeholder Consultations by Island*

Island	Date	Number Consulted
Mauke	22/23 October 2025	22
Aitutaki	25/26 November 2025	22
Mitiaro	14/15 April 2026	13
Atiu	28/29 April 2026	30
Penrhyn	13 July 2026	
Manihiki/Rakahanga	15 July 2026	
Pukapuka/Nassau	17 July 2026	
Mangaia	18 August 2026	

Due to airline logistics issues, the consultations with all the Northern Group island communities were delayed to July 2026. The final consultation will be on Mangaia in August 2026.

On each island, meetings were held with the Mayor, Councillors and staff of the Island Government, NGOs and the general community. These meetings re-enforced awareness generated from the *Pa Enua* Forum and EDA consultations and focused on the proposed activities to support the most disadvantaged households.

Site visits were also arranged to the houses of families who may participate in the project on Aitutaki and Mitiaro. The case studies included in Part II-B are based on these site visits.

The only inhabited island that was not visited was Palmerston as there is no scheduled sea or air transport. The Mayor and EO were consulted at the Pa Enua Forum.

Not including the EDA engagements, the total number of people consulted to date is 523. Of the people consulted, 275 are women and 247 are men. One was unassigned.

This will be added to once the second round of island consultations are completed.

Figure 10
Stakeholder Consultation on Mauke Island



GOVERNMENT AGENCIES

Several meetings have been held with the MFEM who will be the NIE for the DCCI. As the MFEM is also the Accredited Entity for the GCF funded EDA project, these meetings were crucial to ensuring the separation but coordination of the DCCI and EDA.

Meetings were also conducted with CIG agencies that will be involved with the project. Staff from the MIA, ICI, EMCI, were met with on different occasions to gather data and to discuss implementation. The MIA model of implementation for the Special Assistance Fund was utilized as the basis for the design of the DCCI activities. The EMCI database gave more information on vulnerability aspects of households.

Several meetings with ICI were held as part of the design phase of the project. The quality of the renovation work for the disadvantaged families homes will be guided by the Building Code 2019. On each island, the Infrastructure staff will assist with the logistics around storage and transportation of the materials to each work site.

Information from the agencies involved, the island governments and the direct potential beneficiaries have been incorporated into the design. The island visits and direct contact with the potential beneficiaries enabled the survey data to be verified and updated. These

discussions also led to the scope of activity being revised and broadened for the project to include accessibility.

Stakeholder consultation will be ongoing during implementation beginning with inception missions to all the islands in the *Pa Enua*. There will be a CFP for each island who will be the point-of-contact for participating families and they will be the focus for the ongoing stakeholder engagement. That person will also work closely with the Island Government and communicate regularly with the PM for the DCCI.

I. JUSTIFICATION FOR FUNDING

This proposal is submitted under the Locally-Led Adaptation funding modality rather than as a regular country proposal because the primary adaptation decisions, prioritisation of beneficiary households, and implementation arrangements are designed to occur at island and community level. The DCCI does not rely only on a nationally directed delivery model; instead, it devolves key decision-making to Island Governments, supports direct household-level access to climate finance, builds local institutional and community capacity, and uses island-based focal points and local implementation arrangements. This approach is necessary because the climate vulnerabilities being addressed are household and island-specific, particularly among disadvantaged families in the *Pa Enua*.

ADAPTATION FUND ADDITIONALITY

The most disadvantaged people in our communities are also often the most vulnerable to the impacts of climate change. Implementing an adaptation project to support those communities is an expression of the inclusive approach to increasing the resilience of the Cook Islands.

The MIA through the Special Assistance Fund has been providing funding assistance to some disadvantaged families, **but the amounts available are insufficient to meet the full scope of work required to climate-proof these homes**. With the implementation of the EDA project, more families will be able to access funding support, but this will only be approximately 40% of the estimated cost to be fully compliant with the climate adaptation components of the Building Code 2019⁵³.

Through the funding assistance of the Adaptation Fund, we will be able to boost that percentage to an average of 75% of the estimated cost to be fully compliant. In some cases, it will be 100% of the costs as some homes will require less renovation work. The aim of the DCCI project, with the assistance of the AF, is to upgrade 430 homes with disadvantaged families residing in them in the *Pa Enua*, to the level that is required in the Building Code.

CURRENT ASSISTANCE

In FY 2024/25, the SAF received 57 applications of which 38 were approved. Twenty of the approved applications were completed and the total available funding of NZ\$250,000 was

⁵³ See Table 7 above.

expended⁵⁴. Table 13: Special Assistance Fund Expenditure FY2024/25 describes the breakdown of the items that the funding was utilized for.

The SAF is a fund that supports the needs of the most disadvantaged in our society. House improvements received 62.5% of the available funding, but this cost included freight and labour, reducing the total funds available for the materials to renovate the homes.

Table 13
Special Assistance Fund Expenditure FY2024/25

Item	Cost NZD
House Improvements	156,250.79
Diapers	36,664.48
Assistive Devices	48,118.00
TOTAL	\$241,033.27

Under the DCCI, the funding spent for each identified home renovation will be spent on the materials necessary to undertake and finish the work. This will enable a significant scaling-up of the scope of works, substantially increasing the resilience of the homes and the families living in them. The freighting of the materials and the labour on each island will be costed as part of the EDA funding.

BARRIERS TO ADAPTATION

As has been described previously, a combination of low incomes and higher cost of living in the *Pa Enua* affects the ability of families on those islands to be able to make their homes more weather-proof and able to withstand the growing intensity of weather events. Adding other factors such as age and disability restricts some families adaptation efforts even more.

Table 14: Barriers to Adaptation, lists these barriers along with how the DCCI will address them to enable participation in the DCCI adaptation activities.

Table 14
Barriers to Adaptation

Barriers	DCCI Actions
Low disposable income	Eligible families will receive a grant to implement the necessary renovations
Lack of technical expertise on-island	Community workshops and one-on-one assistance to facilitate applications.

⁵⁴ Data provided by MIA, March 2026.

	On-island work gangs will be supplemented by extra labour from Rarotonga.
Distance from main centre affects access to resources.	Procurement and shipping to island organized by PMU.
Age restricts access to finance	No age qualification restriction for grant
Disability	People with disabilities are part of the target group for assistance. Focal Points provide one-on-one assistance to enable participation
Gender bias in participation	Inclusive approach for consultation will continue for implementation. Renovation work benefits both women and men in the household

LOCALLY-LED ADAPTATION PRINCIPLES

The second Principle of the LLA funding modality under the AF is: *Addressing structural inequalities faced by women, youth, children, disabled and displaced people, Indigenous Peoples and marginalised ethnic groups*. The primary focus of the DCCI is to address some of those structural inequalities and to encourage those vulnerable and marginalised individuals to be part of making their own adaptation decisions.

In addition, this project operationalizes most of the other Locally-Led Adaptation principles by:

- **Devolving decision-making to the lowest appropriate level:** decision-making will be at the local Island Government level and families are directly accessing the available climate finance.
- **Providing patient and predictable funding that can be accessed more easily:** local governance processes are being developed and capacity built.
- **Investing in local capabilities to leave an institutional legacy:** awareness and understanding of climate risk will be increased through the planned workshops. The implementation on each *Pa Enua* island will be led by people who reside on the island.
- **Flexible programming and learning:** given the challenges presented by the geographical spread of the islands and maintaining their connectivity, building flexibility into the programming and incorporating adaptive management will be necessary to be able to implement the project successfully.
- **Ensuring transparency and accountability:** by involving the participating families in the completion assessments and the IG in the monthly reporting, we will ensure that transparency and accountability are maintained throughout the implementation of the project.
- **Collaborative action and investment:** the coordination with the GCF funded EDA will produce better adaptation outcomes for the disadvantaged families in the *Pa Enua*.

ADAPTATION FUND COMPLEMENTARITY WITH THE GREEN CLIMATE FUND

There is an ongoing discussion between the AF and the GCF to enhance the complementarity of the two funds. While the dialogue continues at the Secretariat levels, the DCCI project will be an example of how complementarity can actually be implemented at a project level.

The adaptation needs of the disadvantaged families in the *Pa Enua* is the focus and by coordinating the funding streams we can improve the support that can be provided. We will discuss in Part Three how the project implementation structure will facilitate the management of two funding sources so that the end result is seamless for the identified families.

J. SUSTAINABILITY

PROJECT COMPONENTS

Component One of the DCCI has a focus on preparing the Island Government and the wider community to be able to actively participate in implementing the activities related to the upgrading of homes on their island. The IG focus will be on the implementation of the DCCI but the governance processes and strengthened decision-making will be applicable for their participation in other projects such as the EDA.

The DCCI is not creating new processes but will be strengthening existing support systems by working with IGs who through the SAF are already supporting the disadvantaged and most vulnerable in Cook Islands communities.

The application of the upskilling activities for the community will not end with the completion of the DCCI. Gaining experience and understanding of applying for funding assistance will be retained for future endeavours, which could be project related or more personal engagements with commercial organisations.

The community awareness raising will also build sustainability in the *Pa Enua* communities by making them more prepared for climate change impacts. Climate Change Focal Points are going to be recruited to support the implementation on each island. They are people who are resident on the island and building their capacity will also contribute to the sustainability of the communities.

For Component Two, ensuring that the renovation work is completed to a high standard will be important to the sustainability of the project. The Building Code gives the guidance but this has to be applied by trained inspectors who can provide the quality control during implementation. The inspectors will also conduct the final inspection and only sign-off on the project once any issues have been addressed.

Meeting the building standard for homes means increased resilience for families and individuals. This will be an immediate benefit along with more long-term sustainability outcomes for children in those families growing up in a secure more resilient home. Completing the work to a high standard also has a financial benefit for the families as future maintenance costs are reduced.

PROJECT STRUCTURE

Carrying out a thorough risk assessment as part of the project design is an important part of ensuring sustainability of the project outcomes. Following that up with mitigating or managing the risks facilitates the implementation and also contributes to successful outcomes and the sustainability of the project. Project risks are discussed fully in Part III.

EXIT STRATEGY

Creating long-term benefits through knowledge management and particularly recording lessons learned means that the knowledge gained can be utilized in future project designs. These projects may be for climate change adaptation but may also be for other agencies.

Data gained from the implementation of the DCCI will benefit the activities of other CIG agencies. As an example, the MIA engages continuously with the disadvantaged families through welfare support. Staying current with the location and living conditions of those families will assist with their ongoing support.

The EMCI division within the OPM will also be able to update their databases on the exposure of families in case of disaster and if required, amend plans to assist those families that may need it. Knowing where they are and the condition of their homes will be an important part of disaster planning for all the communities on the respective islands.

K. OVERVIEW OF RISKS

In accordance with the Adaptation Fund Environmental and Social Policy (ESP), a self-screening and self-assessment process has been conducted in order to determine compliance with the ESP. Consultation on the risks has been carried out with the relevant CIG agencies and with the individual IGs.

The evaluation is that there will be no adverse environmental or social impacts caused by the project. The works are localized, avoid significant environmental disruption, and do not involve land acquisition, displacement, or significant risks to vulnerable populations. There are no unidentified sub-projects and therefore the DCCI should be assessed as a Category C project.

The scope of work under the DCCI is not complex or large-scale but instead is small-scale renovations of existing buildings. Table 15: Checklist of Project Risks shows the result of the screening process. Comments on the eight risks that have some application to the DCCI project are provided below.

More specific discussion of the financial and project risks is included in Part III-B, and environmental and social risk in Part III-C.

Table 15
Checklist of Project Risks

Checklist of environmental and social principles	No further assessment required for compliance	Potential impacts and risks – further assessment and management required for compliance
<i>Compliance with the Law</i>	✓	
<i>Access and Equity</i>	✓	
<i>Marginalized and Vulnerable Groups</i>	✓	
<i>Human Rights</i>	✓	
<i>Gender Equality and Women's Empowerment</i>	✓	
<i>Core Labour Rights</i>	✓	
<i>Indigenous Peoples</i>	✓	
<i>Involuntary Resettlement</i>	Not applicable	
<i>Protection of Natural Habitats</i>	Not applicable	
<i>Conservation of Biological Diversity</i>	Not applicable	
<i>Climate Change</i>	Not applicable	
<i>Pollution Prevention and Resource Efficiency</i>	✓	
<i>Public Health</i>	Not applicable	
<i>Physical and Cultural Heritage</i>	Not applicable	
<i>Lands and Soil Conservation</i>	Not applicable	

ADAPTATION FUND PRINCIPLES

Compliance with the Law

Increasing the resilience of the homes for disadvantaged families is the overall focus of the DCCI and achieving that will also make those homes compliant with the new Building Code. All the aspects of the project implementation will be conducted in accordance with Cook Islands laws and regulations and this is discussed above in section E – National Technical Standards. At a local government level, compliance will be applied as part of the decision-making by the Island Governments.

Access and Equity

Building on all the stakeholder consultations to prepare the funding proposal, the activities under Component One will reach into the communities on each island to create the awareness of the project. This will be coordinated with the implementation of the EDA which has a broader scope than only the disadvantaged families.

As well as awareness activities, stakeholder mapping will be carried out utilizing the data from the MIA and the EMCI. The CFP will then visit the families who could be included within the sphere of the DCCI. Those families that were not able to attend the workshops, but are interested in submitting one, will be given assistance to complete an application.

All the applications from the *Pa Enua* will go through the same application and evaluation process and this is described in detail in Part III-A.

Marginalized and Vulnerable Groups

The disadvantaged families living in the *Pa Enua* are part of the marginalized groups in our society. As a result, they are among the most vulnerable to climate change. The DCCI will provide support to these families to reduce that vulnerability.

No other marginalized groups will be impacted by the implementation of the DCCI.

Human Rights

The Cook Islands has not been cited in any Human Rights Council Special Procedures. The Cook Islands has ratified the Convention on the Rights of the Child (1997), the Convention of the Elimination of All forms of Discrimination Against Women in 2006, and the Convention on the Rights of Persons with Disabilities (2009).

Policies to support the application of the conventions have been developed by the MIA, who will be involved in the implementation of the DCCI. One of their responsibilities will be to monitor the implementation for any potential or actual human rights abuse.

Gender Equality and Women's Empowerment

The DCCI will not exclude any gender group based on legal, regulatory, or customary grounds. The implementation will also not support or exacerbate gender inequality or the consequences of gender inequality. A more detailed gender assessment is included in Part III-C.

Core Labour Rights

The Cook Islands is a member of the International Labour Organisation (ILO) and is represented by the MIA Labour division at meetings.

The MIA, in consultation with the Cook Islands Chamber of Commerce as the employers' representative and the Cook Islands Workers Association as the employees' representative compiled the Decent Work Country Program (DWCP)⁵⁵. This is a five-year action plan for advancing decent and fair work in the Cook Islands. The priorities identified in the plan are implemented by the Ministry of Internal Affairs and the tripartite partners.

The renovation work will be carried out in the main by CIG workers, but they may be supplemented by private sector contractors. As part of their broader mandate, the MIA will ensure that labour laws and work standards are adhered to.

Indigenous Peoples

The communities in the *Pa Enua* and the families that live in the dwellings to be renovated are part of the indigenous people of the Cook Islands. They have been consulted and provided views that have been included in the design of the DCCI.

Pollution Prevention And Resource Efficiency

A Waste Reduction and Management Plan has been included as Annex Two. It is based on a sample list of materials that will be needed for the renovation work on the *Pa Enua* homes.

The first step will be to reduce the potential waste by compiling accurate estimations of the material requirement for each house. Having trained inspectors to carry out the work will be essential to achieving that first step.

Emphasising re-using and recycling of materials will be a requirement for workers. Doing this for cut-off timber is already standard practice for Cook Islands builders and this needs to be maintained.

It is unlikely that builders will be exposed to hazardous materials, but training on this will be part of the upskilling to be conducted under the EDA.

⁵⁵ <https://www.intaff.gov.ck/labour-and-employment-relations/international-labour-organisation/>

PART III: IMPLEMENTATION ARRANGEMENTS

A. PROJECT IMPLEMENTATION

The overall goal of the DCCI project is to increase the resilience of our disadvantaged communities in the Cook Islands by focusing on those families living on the islands outside of Rarotonga. Given the nature of inter-island shipping and the range of operating environments on each island, there will be significant challenges to the implementation of this project. Through the details set out below, we will describe how we are going to overcome those and other challenges to deliver the successful adaptation outcomes that address the needs of those families.

DEFINING THE ADAPTATION ACTIONS

It has been described previously how stakeholder consultations have influenced the prioritization and design of the DCCI. *Pa Enua* Households are deciding what areas they want to use the funds for and the funds they will receive will all go on materials for the work.

A large portion of the implementation costs are being funded by the EDA project including significant cost items such as the procurement process for materials, freight for shipping to the islands and labour on the island.

For the MIA survey in 2025⁵⁶ families were asked to identify the forms of support they needed the most and multiple selections were allowed. Table 16: Household Identified Needs shows the disadvantaged household key identified needs.

Table 16
Household Identified Needs

Total Households	Female Resident	Male Resident	Household Number and Percentage Identifying Specific Needs			
			Water Tank	Septic	Roof	Bathroom Facilities
371	639	678	191	140	165	66
			51.5%	37.8%	44.5%	17.8%

There were 1317 people resident in the 371 households. Of these 48.52% were female residents and 51.48% were male residents⁵⁷. For the 371 *Pa Enua* survey responses, 196 (52.8%) were filled out by women and 175 (47.2%) were completed by men.

⁵⁶ MIA 2025. *Identifying Vulnerable Households for Climate Resilience Support*, Information Paper, Ministry of Internal Affairs, Rarotonga, Cook Islands.

⁵⁷ Ibid, pg 1.

Based on that survey, the scope of the work to be funded under the DCCI project will include:

- Re-roofing
- Roof Tie-downs
- Windows and Shutters
- Accessibility including internalising toilet and bathroom
- Septic tank repair
- Spouting and Water tanks.

For implementation purposes 430 households is the number that is targeted for assistance. The figure of 371 is the number of respondents for the MIA survey but there may be more households that will need assistance, but which did not take part in the survey. A variation of just over 15% has been added to the 371 to make 430 households the target number.

APPLICATION AND EVALUATION

Within the first six months following project approval, promotional material will be developed to create the awareness of the call for proposals for funding under the DCCI. This will build on the awareness and momentum that the EDA will create as it begins to raise awareness in the fourth quarter of 2026. Despite the slightly earlier start for the EDA, it will be important to create a separate identity for the DCCI so that the disadvantaged families in the *Pa Enua* are aware of the greater potential work-scope for their application.

Call for Proposals

The application process will begin with the Call for Proposals. For any available grants managed by MFEM, there is a requirement to provide a public notice of Grants and issue a call for proposals. The public notice will be advertised in the newspaper and MFEM and CCCI will publish the required information on their websites and social media pages. Hard copies will be available at the IG office on each island.

Step One

A family interested in applying for funding assistance from the DCCI will contact either the MIA worker or the CFP on their island. The CFP and MIA worker will visit the home to do an initial assessment based on the eligibility criteria. If they are eligible the CFP will schedule a site visit by the building inspector. When CFPs assist applicants with their submissions, they will also undertake basic baseline vulnerability and risk assessments of each dwelling.

The building inspector will confirm whether the house is upgradable and will also confirm the scope of works that the family would like to undertake. The CFP will then complete the application for funding to be signed by the family representative and submit it to the IG for consideration.

Step Two

The IG will convene to consider the applications. Their review will be based on eligibility of the applicants, completeness of the information presented to the CFP and MIA staff and whether there is any other relevant information affecting approval. Following the meeting the applicants will be advised, and all the approved proposals will be forwarded to the PM for consideration by the PMU.

Table 17: Eligibility Criteria sets out the mandatory criteria and the assessed criteria which the applicants must satisfy for the application to be considered by the IG. If a proposal is declined by the IG, then their decision can be appealed by the applicant.

Table 17
Eligibility Criteria

MANDATORY CRITERIA	NOTES
Cook Islander	Indigenous or have been granted Permanent Residence.
Resident in <i>Pa Enua</i>	Residing in house on the island. Returning residents must have been residing on the island for at least one consecutive year.
Ownership of home	Or an MOU allowing residence signed by owner of the home.
21 years or older	Proof may be required such as a Birth Certificate.
Less than US\$24,000 p/a h/hold income	Based on MIA assessment and confirmed through wages/salary evidence.
House built before 2019 and suitable to be upgraded	Based on initial house inspection.
ASSESSED CRITERIA	
Location in high-risk climate area	Based on CCCI assessment.
Elderly, disabled, health or hardship qualification	Based on MIA assessment. Elderly is age over 60 years.

Step Three

The PM will review the eligibility of each application as a final verification and provide a report to the PMU. The report will be for a higher-level review and will contain aggregated data by island. If any issues are identified, they will be raised with the PMU and if required, the IG as well.

The PMU will be the final step in evaluation but will only become involved in an individual application if there is a review requested of the IG recommendation.

Reviewing a Decision

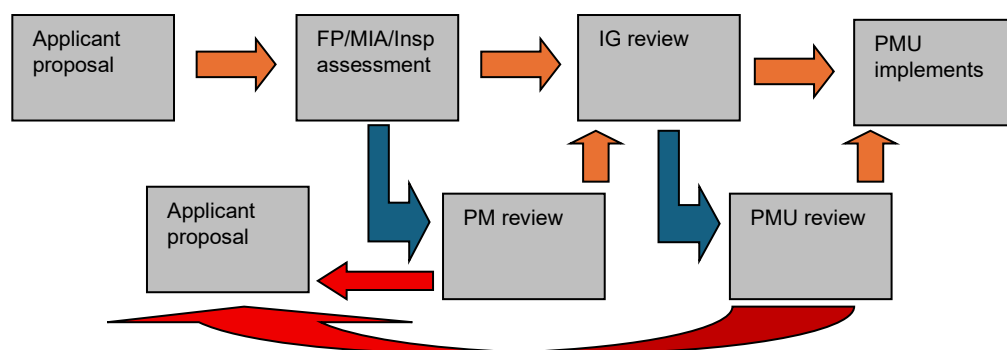
Figure 11: Decision Review Process illustrates the ability for an applicant to ask for an eligibility decision to be reviewed. This process is specific to a review of eligibility to receive funding and is different from the grievance redress mechanism in Annex Five.

The normal process of approval will be through the steps described above. If the applicant is deemed ineligible at the first assessment, then they can ask for that decision to be reviewed

by the PM. The PM will communicate with the assessment team and either agree with the decision or vary it. If the PM agrees with the decision then the application will be declined. If the decision is varied, then it will proceed to evaluation by the IG.

If at the IG evaluation an application is deemed ineligible, then that decision can be reviewed by the PMU. The PMU will communicate with the IG and either agree with the decision or recommend that they vary it. If the PMU agrees with the IG then the application will be declined. If the decision is varied, then it will proceed to implementation by the PMU.

Figure 11
Decision Review Process



Key: Application progresses →
Application reviewed ↓
Application denied ←

Other

By basing the decision-making on eligibility at the local island level, it is giving the residents on the island more involvement and more control over the implementation of the project. This will simplify the process and enable more direct access to climate finance.

As well as the decision-making at IG level for approval of applications, the scheduling of the implementation of the renovation work on their island will also be determined by the IG.

Not every disadvantaged family will have to be part of both projects. If the scope of work can be funded totally under the DCCI, then the supplementary funding from the EDA will not be necessary. The application and evaluation process will be the same regardless of this.

PARTICIPANT IMPLEMENTATION RESPONSIBILITIES

Adaptation Fund

Once the proposal is approved, then the AF will take on some responsibilities in supporting the

implementation of the project. The funding flow originates with the AF and provision of tranches is the first step that enables the resilience-building work to be implemented.

After implementation begins, the NIE will provide annual Project Performance Reports (PPR) to the AF Secretariat. The timely review and feedback on those reports will be an important part of maintaining the flow of funds which will sustain the momentum of the project implementation.

National Implementing Entity

The NIE in the Cook Islands is MFEM which facilitates the relationship with the AF through the Development Coordination Division (DCD). The two previous projects in the Cook Islands funded by the AF (PEARL and SRIC-CC) both had MFEM as the NIE so the fiduciary standards and institutional capacity are already established.

DCD will be represented on the PMU and will have regular insight into implementation progress. In accordance with the Legal Agreement, they will have responsibility for *inter alia*:

- coordinating tranche requests to project workflows,
- provide the financial oversight for procurement activities including contracts,
- meet AF reporting requirements,
- organize the annual audit,
- regularly review the operational risk assessments.

Climate Change Cook Islands

The Executing Entity (EE) will be the CCCI. They will take on the Chairperson role of the PMU, and the Chairperson will sign off on the quarterly report to the NIE. The relationship as an EE will be set out in a Letter of Agreement, which was the arrangement used for the previous Cook Islands AF project (PEARL). Some of their responsibilities will be:

- facilitating regular meetings of the PMU at least quarterly but also on demand,
- providing guidance and support to the PM and PFO through the Director and other CCCI staff,
- facilitating the coordination with the EDA project, primarily through the EDA Coordinator based in the CCCI office.
- facilitating coordination with other climate change activities in the Cook Islands.

Project Management Unit

There will be one representative of each of the CIG agencies involved with the implementation of the project on the PMU. Their role will be to provide updates on their agency's activities that overlap with the DCCI and facilitate coordination. Along with the members from MIA, ICI, DCD, and CCCI, there will also be a *Pa Enua* Island Government representative from the *Pa Enua* division at the OPM.

The participation of the MIA and ICI will be described in a MOU, which will be agreed by the parties after project approval and before the Inception Workshop. The CCCI and the NIE will initiate the MOUs as a part of establishing the PMU.

The main function of the PMU will be the implementation of the multi-year workplan for the DCCI. As part of that the PMU will:

- recruit the PM and PFO,
- plan the inception workshop,
- receive recommendations for funding from the individual IGs,
- conduct the assessment of the island proposals,
- provide feedback if required and/or follow-up on recommendations,
- facilitate the individual grant agreements,
- oversee management and coordination of procurement and shipping,
- monitor the coordination with the EDA implementation,
- ensure the completeness and timeliness of the reporting requirements are satisfied.

The PMU will establish the sequencing of the work schedule by island, which will be agreed with the individual IGs. The timing of the procurement and shipping will be based on the island implementation dates.

Island Governments

Island Governments will be responsible for providing oversight on the implementation of work on their island. As such they will:

- support and participate in the workshops under Component One,
- receive and review applications and make recommendations to the PMU for successful applicants or unsuccessful applicants,
- receive the procured materials and identify secure storage facilities,
- confirm the implementation schedule for the work on their island,
- endorse the monthly reports to the PMU.

The IGs will be overseeing a much broader schedule of work as part of the EDA and a Contract Activity Manager (CAM) will be recruited to supervise and administer this work on their behalf. This will include the renovations of the homes that qualify under Tier One of the EDA. The CFP and the MIA rep on each island will support the planning and implementation work for these homes as those families will also be receiving support as part of the DCCI.

Families

Once a family decides to apply for assistance, the CFP and the MIA representative will assist with completing the application. If there is more information required during the implementation process, the family may be contacted again. This may be at various stages such as:

- during the IG review,
- after being forwarded to Rarotonga, for information on the requested materials,
- upon shipping of the materials, as an update on progress,
- when the island work schedule is being agreed,
- when the renovation work is finished to sign off on the completion assessment.

Contact with the families will be conveyed through the CFP.

PROJECT IMPLEMENTATION STAFF

Table 18: Project Implementation Staff shows some of the employment details for the staff which will be recruited for the implementation of the DCCI. A Project Manager (PM) and a Project Finance Officer (PFO), based in Rarotonga will be assisted by a CFP on each island.

Draft Terms of Reference (TOR) for the three positions are attached as Annex Three. Once the PMU is established the TORs for the PM and PFO will be reviewed and confirmed by the PMU as part of the recruitment process. The CFPs will have already been recruited under the EDA and the DCCI will contribute to their salaries. Finalising the details of the implementation plan will be one of the first tasks for the PM and PFO.

Table 18
Project Implementation Staff

POSITION	Employment Status	LOCATION	REPORTING TO
Project Manager	Full-time	CCCI office	CCCI Director
Project Finance Officer	Full-time	DCD office	DCD Director
Focal Points	Part-time	On each island	Project Manager

EDA Staff Coordination

Coordination with the EDA staff will be an important aspect of the DCCI implementation. By combining the two funding streams there will be greater benefits for the disadvantaged families and this process needs to be as seamless as possible. Table 19: EDA Project Staff lists the three staff that will be coordinating the implementation with the DCCI staff.

The Tier One Project Coordinator (TPC) will be responsible for the implementation of activities supporting Tier One of the EDA. As they will also be located in the CCCI office and also report to the CCCI Director, coordination of activities with the DCCI Project Manager can be achieved quickly. At this stage this could be by the TPC focusing on Rarotonga and the PM focusing on the *Pa Enua*, but this will be confirmed by the PMU as part of the recruitment process.

Table 19
EDA Project Staff

POSITION	Employment Status	LOCATION	REPORTING TO
Tier One Project Coordinator	Full-time	CCCI office	CCCI Director
Contract Activity Manager	Full-time	On each island	EDA Project Manager
Climate Change Focal Point	Part-time	On each island	DCCI Project Manager

There will be a CAM placed on each island to work with the IG on the implementation of the EDA. Their specific responsibilities are:

- Provide oversight of the trade contractors on behalf of the GCF Accredited Entity and the Executing Entity (CCCI).
- Provide technical reports for building code compliance.
- Support pre-construction inspections and verify scope of work,

- Support post-construction inspections and conduct terminal assessments of completed works.

The CAMs will monitor implementation via reports, site visits, and compliance checks. They will also support the IG in receiving and storing the materials and manage the dispersal.

Climate Change Focal Points

The CFP on each island will be supporting the implementation of both the EDA and DCCI projects on their island. Their role has been described as part-time in Table 17 as the funding for the positions is being divided between the two projects. For the DCCI the FP will be the primary contact point for the families applying for and receiving funding.

PROJECT REPORTING

Part of the reporting workflow has been described previously as part of the knowledge management in Part II-G. Table 20: Reporting Frequency describes the complete workflow as part of the implementation of the DCCI.

Table 20
Reporting Frequency

Report	Subject	From	To
Monthly	Implementation	CAM/FP	IG
Monthly	Implementation	IG	PM
Quarterly	Implementation	PM	PMU
Six Monthly	Implementation	PMU	NIE
Annual	Implementation	NIE	AF
Annual	Audit	NIE	AF

The CAM and CFP on each island will provide a joint monthly progress report on the implementation of the DCCI, utilising the Tarai Vaka Process progress report format, during the time that work is being done on their island⁵⁸. The progress report will include the ongoing monitoring of aspects such as:

- the activity status – how the implementation is progressing, are they achieving milestones, any issues that may hinder implementation,
- the ongoing management of previously identified risks,
- reporting on the relevant gender monitoring indicators,
- any potential changes to the activity,
- any learnings emerging, and
- any grievances recorded.

The IG will review the report and once endorsed, provide that to the PMU within a week of receiving it from the CAM. The PM will consolidate the island reports and on a quarterly basis report to the Project Management Unit (PMU).

⁵⁸ The Tarai Vaka Process is the Cook Islands Government activity management system.

The PMU will use the quarterly reports to assess progress in achieving the deliverables and to consider whether any changes need to be made to the implementation plan. This ongoing monitoring of implementation and feedback to the PM, will support the adaptive management of the DCCI.

The PMU will provide a six-monthly report to the NIE which will include a summary of project implementation including *inter alia* updated project financials, a current risk assessment, and lessons learned. Confirming the design of the formats for all the reports except the annual report will be the responsibility of the PM and will be reviewed by the PMU and confirmed. The format for the annual PPR uses an existing template from the AF Secretariat.

IMPLEMENTATION PLAN

Establishment Phase

The first 12 months following approval will be the establishment phase for the seven-year implementation of the DCCI. Figure 12: DCCI Establishment Phase describes some of the major activities to be accomplished.

Figure 12
DCCI Establishment Phase

Month	Oct-26	Nov-26	Dec-26	Jan-27	Feb-27	Mar-27	Apr-27	May-27	Jun-27	Jul-27	Aug-27	Sept-27
Activity	AF Board meeting	Draft agreement reviewed by CIG	Agreement signed	First Disbursement	PMU established, recruit staff	PM & PSO in place	Inception Workshop and Report	Promotional Material published	Prep for Comp One workshops	Quarterly Report	Comp One workshops begin	Comp One workshops continue

The NIE will agree the LOAs with the participating agencies and establish the PMU. Their first task will be to recruit the PM and PFO. This process will take at least two months, so CCCI will have to begin in January 2027 to have the positions filled before the Inception Workshop. In the interim, the planning for the Inception workshop will be led by the PMU. At the same time, the PMU will also initiate the work to create the promotional and awareness raising resources for the DCCI.

The Inception Workshop will be held in Rarotonga where all the CIG agencies are based. A link will be set-up to enable the *Pa Enua* participants to join the meeting virtually. Working from the date of the Inception Workshop, the first quarterly report should be due in July 2027.

Planning for the activities under Component One will begin in April 2027 and the aim will be to complete all eleven workshops before October 2027. There will be a significant amount of preparatory work to be completed before the island workshops can be implemented such as the timing and logistics for the meetings, confirming the application forms, translations into Cook Islands Maori, finalizing reporting formats, and setting up coordination with the EDA implementation team.

Implementation of Works

Once the Component One workshops are completed, the call for proposals for funding applications will begin. A two-month period will be allowed for the completion and submissions of applications.

The specific timing of the other implementation activities for the remaining six years cannot be specified at present. There will be ongoing regular activities such as PMU meetings, progress reporting, and monitoring and evaluation, but the confirmed scheduling of the renovation works will be dependent on the grant application process and the input of the IGs. Each annual progress report will include a timetable for the upcoming 12 months of implementation of works.

The total target number of houses to be renovated is 430. If that is divided by six years, there would have to be 72 houses with renovations completed each year. That is an average of six per month which is considered achievable as implementation will be across multiple islands of the *Pa Enua* at the same time.

Works Payment Process

There is an established payments process for project expenditure within the MFEM's Financial Management Information System (FMIS) based on establishing a works order, raising invoices and on-line payments for invoices. Cost centres with works orders will be set up for each island in the *Pa Enua*. Delivery of services on an island can then be charged against specific works orders.

Despite being the recipient of the grant, a family will not handle any money or make any payments. Authentication of invoices with approval levels will be established, with the payment actioned by the DCD.

There needs to be some flexibility to the payments system to support purchasing low-cost services or items that can be supplied locally on each island during implementation. These can be supported through an account at the Bank of the Cook Islands (BCI) which has branches on every inhabited island in the country.

Project Termination

The NIE, supported by the EE will complete the Project Completion Report within six months of closure of the implementation of works. This will include a final audit of the NIE Grant Account by an independent auditor.

The NIE will also select an independent evaluator to conduct the terminal evaluation within nine months of the closure of works.

B. FINANCIAL AND PROJECT RISK MANAGEMENT

RISK ASSESSMENT

The screening of project risks reported on in Part II-K has classified the DCCI as a Category C risk project and no adverse or severe environmental or social impacts are foreseen. Similarly,

the more specific risk assessment carried out for the financial and project risks has not identified any high risks. The risk classification level is based on the probability of a risk occurring and three categories have been used: low, medium and high. Table 21: Financial and Project Risk describes the identified risks and their associated risk classification.

The Risk Assessment was based on information taken from:

- reviewing reports and lessons learned from previous AF projects implemented in the *Pa Enua*,
- discussions with the NIE and other CIG agencies,
- EDA risks identified for implementing support for Tier One families,
- reviewing other countries' LLA projects,
- CCCI personnel knowledge of implementing projects in the *Pa Enua*.

Along with more information on the AML/CFT risk, the risks classified as medium-level are discussed further below.

Anti-Money Laundering/Countering the Financing of Terrorism

The MFEM as the NIE has a policy on anti-money laundering (AML) and countering the financing of terrorism (CFT), which sets out the procedures that must be followed to discourage and prevent money laundering and funds being used for terrorism financing⁵⁹.

As part of the policy all AF proceeds will be managed through MFEM's Financial Management Information System which will be used to process all payments. FMIS is a robust platform with built-in compliance functions, including Know Your Customer (KYC), Anti-Money Laundering (AML), and anti-fraud procedures, ensuring integrity, transparency, and traceability of funds. There will only be minimal cash transactions, mostly related to payment for services in the *Pa Enua*.

Cost Overruns

Given the length of time to implement the project, it is likely that inflation will increase the cost of implementation over the seven years. In December 2025 the MFEM forecast for both the 2027/28 and 2028/29 financial years was an inflation rate of 2.7%⁶⁰. An annual allowance of 3.1% of project expenditure has been included in the proposed budget. This adjustment allowance will be supported by regular communication with bulk suppliers to monitor potential cost rises and consistent monitoring of project expenditure.

Separation of Information

Coordination with the EDA is key to delivering a broader range of adaptation outcomes for the disadvantaged families but there is a risk that the financial and management reporting and accountability are compromised. Clear processes for separation of financial and project information will be put into place during the inception phase to ensure that the separate reporting requirements for the AF and GCF are satisfied. The monitoring of implementation and evaluation of results will also be dependent on establishing and maintaining these separate processes.

⁵⁹ MFEM 2018, Policy On Anti Money Laundering And Counter Terrorism Financing 2018.

⁶⁰ HYEPU 2025, Fig 4.3 pg 37.

Table 21
Financial and Project Risk

FINANCIAL RISKS	RISK LEVEL	RISK MANAGEMENT	MONITORING
AML/CFT	L	AML/CFT policy and procedures, FMIS tracking system.	PMU, NIE
Misappropriation of project funds	L	NIE procedures, annual audit, few cash transactions	PM, PMU, NIE
Cost Overruns	M	Build allowance into budget for inflation.	PFO, PM, NIE
AF Tranche payments delayed	L	Ensure PPR submitted within one month of end of year.	PMU, NIE
GCF Tranche payments delayed	L	Regular coordination with EDA staff	PM, PFO
Separation of financial information	M	Clear cost allocation guidelines set during inception.	PM, PFO, PMU
PROJECT RISKS	RISK LEVEL	RISK MANAGEMENT	MONITORING
Corruption	L	Decision-making criteria for allocation of resources transparent. Verification of distribution of materials by reports and site visits by CAM, FP.	CAM, CFP, PM
Disputes during renovation work	L	CAM, CFP site visits to monitor progress. Grievance mechanism.	CAM, CFP, PM
Reporting delays	L	Reporting formats understood and clear deadlines established.	CAM, IG, PM, PMU, NIE
Theft of materials	M	Accurate recording and verification at each step in supply chain. Secure storage on-island.	CAM, IG, PM
Cyclone or Disaster	M	Monitoring of weather, safety and security procedures applied.	CAM, IG, PM
Staff turnover	M	Advice periods, good record-keeping, succession planning.	PM, PMU
Severe workplace injury	M	Workplace safety practices	CAM, PM
Separation of project information	M	Clear reporting lines set during inception.	CAM, IG, PM, PMU
Scope creep	L	Make sure that applicants, builders are aware of areas of assistance, CAM site visits.	CAM, CFP, PM

Theft of materials

With over 400 building sites on 11 islands, there is a medium-level risk of theft. While this presents opportunities, it is balanced by the small population size and living in centralized villages on an island, which makes using stolen materials very difficult.

Accurate recording and verification will be enforced at every step in the supply chain and

building process.

- Procurement requirements will give an accurate list of purchases.
- Bills of lading will document the shipping of materials.
- Secure storage on-island by the IG.
- Distribution on-island monitored by the CAM.
- Usage on-site monitored by the builder and verified by the CAM
- Small items locked away by the builder on-site.

There will also be a zero-tolerance to theft by workers and prosecution will be advised.

Cyclone or Disaster

The probability of a cyclone or weather-related disaster occurring in the Cook Islands during the implementation period has been assessed as medium-level. There is no action that can be taken to prevent this so mitigating actions for any potential impact have to be applied.

There are good early warning systems in place with the Cook Islands Meteorological Service based on tracking and updated weather bulletins. Builders will have the time and will be required to secure or remove any loose materials from their sites. There are cyclone evacuation centres on every island so a family will have the option to move to another place if their house is weather compromised because of the stage of work.

On Rarotonga, back-ups of project documentation are stored digitally and project management work can be continued from remote locations if required.

Staff Turnover

With a seven-year implementation period, it is probable that staff turnover will occur. The risk can be mitigated by keeping accurate records and thorough reports which are accessible for all staff to keep up to date with project implementation. Three-month notice periods for intending departures will also be included in contracts to allow enough time for replacements to be identified and for a sufficient handover period.

The coordination with the implementation of the EDA and having a Project Coordinator located in the same office will also provide support if there is a sudden change in DCCI project staff.

Severe Workplace Injury

In the Cook Islands, workplace safety and health are governed by the Employment Relations Act and overseen by the MIA. Employers have a legal obligation to take all reasonably practicable steps to maintain a safe work environment, including mandatory accident registers and providing specialized training for dangerous machinery.

A building site can be a high-risk place for injuries. Good workplace safety practices will mitigate the risk and will be part of the compulsory training that builders undertake to be a contractor for the EDA or DCCI. On each island the practices will be overseen by the CAM and some of the good housekeeping practices include:

- appropriate safety gear,
- maintaining a tidy site,
- having clear access and egress ways,

- having designated areas for material delivery and waste storage,
- regular maintenance of plant and equipment,
- installing barriers where required.

Overall Project Risk

The PM will be responsible for overall monitoring of risks and will complete the quarterly risk assessment. There will also be a risk section as part of the annual report.

Maintaining risk awareness throughout the seven-year implementation of the DCCI will help to manage any impacts from the potential risks. This will be accomplished through regular communications and publicity about implementation progress.

C. ENVIRONMENTAL AND SOCIAL RISK MANAGEMENT

RISK ASSESSMENT

Based on the screening process against the checklist of project risks, and the more specific risk assessment process described above in Part III-B, there has been nothing identified as a major environmental or social risk for the implementation of the project.

Table 22: Environmental and Social Risk lists some potential low risks from the project activities. The measures necessary to avoid, minimize, or mitigate those potential environmental and social risks are discussed further below.

Table 22

Environmental and Social Risk

ENVIRONMENTAL RISKS	RISK LEVEL	RISK MANAGEMENT	MONITORING
Building waste	L	Waste Management Plan	CAM, PM
Septic tank seepage	L	Safety procedures	CAM, PM,
SOCIAL RISKS	RISK LEVEL	RISK MANAGEMENT	MONITORING
Disruption of families during renovation work	L	Scale of work, plenty of time to plan	CAM, CFP, PM
Gender Discrimination	L	Project design is gender sensitive and project implementation gender responsive. Awareness of GRM process.	CAM, CFP, PM

Building Waste

There will be waste generated by the storage and usage of building materials on the *Pa Enua*

islands. Procedures have been designed which will be applied on each island to manage the flow of waste. This has been set out in detail in Annex Two: Waste Reduction and Management Plan.

Septic Tank Seepage

Through the CITTI, with funding from the EDA, there will be training provided for contractors who intend to be a service provider for the EDA and DCCI. Part of that training will include sanitation assessment and handling procedures for upgrading septic tanks. Ensuring that workers have the correct health and safety gear when repairing or replacing septic tanks will be part of the process.

Disruption of Families

Although the majority of the work will be small-scale, there may be some disruption to the families in the house. Families will be consulted when the implementation schedule for their island is being confirmed and they will have time to make arrangements for a temporary move if required.

Gender Discrimination

The risk for the DCCI is that gender discrimination prevents every participant from receiving the benefits of the project equally. A Gender Assessment has been carried out and is described in Annex Four: Gender Action Plan. The findings are incorporated into the project design to ensure that the DCCI provides for equal participation and benefits regardless of gender.

A Grievance Redress Mechanism (GRM) will be established and awareness of the process promoted through the island workshops. More detail on the GRM is in Annex Five: Grievance Redress Mechanism and Whistleblower Procedure.

GENDER EQUALITY

The gender assessment and Gender Action Plan (GAP) have been developed for the DCCI project in alignment with the AF Gender Policy. These documents were developed through a process combining a comprehensive literature review and extensive stakeholder consultations. The stakeholder consultations were conducted during 2025 and 2026 in both English and Cook Islands Māori. Stakeholder engagement included women's groups, community leaders, public agencies, and private sector representatives in Rarotonga and the *Pa Enua*.

Pa Enua Social Context

The Cook Islands is making progress in advancing gender equality⁶¹. Part of this is influenced by changing gender roles overseas as women move out of historically segregated, nurturing, or administrative roles. There are also shifting population demographics driving change in the *Pa Enua* as families have to adapt to less people being available to carry out normal family functions.

There is still an income gap nationally as average annual income is \$20,209 for males and

⁶¹ MIA, 2024, pg 6. *Cook Islands Country Report for Women*, Ministry of Internal Affairs, Rarotonga, Cook Islands.

\$18,348 for females, but this has narrowed considerably since 2006⁶². Women are becoming much more visible in decision-making within the family. As described above, of the 371 responses to the MIA survey, 196 (52.8%) were filled out by women and 175 (47.2%) were completed by men.

In the *Pa Enua*, and to a greater extent on Rarotonga, traditional gender roles are changing. As an example, the food supply chain is more intermittent in the *Pa Enua* than on Rarotonga and the result of this is a greater reliance on producing their own food. Fishing, hunting and planting have traditionally been men's roles; while housekeeping and child-raising were part of women's roles. With the changes though, these gender roles are becoming much more mixed.

IMPLEMENTATION CONSIDERATIONS

The gender assessment raised some potential issues that have been taken into consideration in the design and implementation of the project. These are:

- Ensuring that there are no gender-based constraints on participating in the project.
- Supporting specific out-reach to encourage women to participate at all levels within the implementation process, including the building work-teams.
- Implementing gender-responsive awareness campaigns to promote participation in awareness raising workshops and funding application support services.
- Ensuring decision-making criteria are gender blind and allocate funding resources fairly based on identified resilience needs.
- Monitoring of the project has gender specific indicators.
- Gender responsive results framework and indicators
- Knowledge flows and sharing include all genders.
- Public communications during implementation are open and broad reaching.

These are discussed in more detail in Annex Four including where the monitoring responsibilities will lie.

D. MONITORING AND EVALUATION

The Monitoring and Evaluation (M&E) framework put into place for the DCCI will support several applications: project implementation; project evaluation; and project reporting.

PROJECT IMPLEMENTATION

Progress on project activity implementation will be monitored through the regular project reporting system described in Table 21 above. Annex Six: Monitoring and Evaluation contains Table 8.1: Project Monitoring which describes *inter alia* the indicators, data sources and monitoring responsibility for the DCCI outputs and activities.

The responsibility for monitoring project implementation will be with the PM and they will establish

⁶² Ibid, pg 22.

the operational process to implement the monitoring framework. The indicators in Table 8.1 will guide the measuring of progress in order to reach the set targets. The M&E framework will also monitor and facilitate the reporting on the indicators in the GAP.

The PM will be chiefly responsible for the monitoring and managing of project risks identified in Table 21: Financial and Project Risk, and of risks identified in Table 22: Environmental and Social Risk. The PM will be supported by the PFO, CAM and CFPs and will monitor the identified risks through the regular reporting system. Similarly, the PM will use those reports to also indicate any upcoming unidentified risks or impacts.

Financial monitoring supporting project implementation will be carried out by the PFO, using the FMIS system to track project expenditure. Table 23: Project Financial Monitoring shows the Activity level and Project level financial monitoring that will be part of the M&E framework.

Table 23
Project Financial Monitoring

Project Area	Action	Data Sources	Data Collection Methods	Frequency	Responsibility
Activity Level	Procurement processes and agreed contracts	RFQ and Tender reports, FMIS reports	Reviewing project Reports, Participation on Tender Teams	Monthly and Quarterly	Project Financial Officer, Project Manager
	Expense payments and tracking	FMIS reports, PMU reports	Reviewing project Reports	Monthly and Quarterly	Project Financial Officer
	Variance against budget	FMIS reports, PMU reports	Reviewing project Reports	Monthly and Quarterly	Project Financial Officer
Project Level	Project Support expense payments and tracking	FMIS reports, PMU reports	Reviewing project Reports	Monthly and Quarterly	Project Financial Officer, Project Manager
	Annual accounts and audit	FMIS reports, PMU reports	Reviewing project Reports	Annual	Project Financial Officer, Project Manager

The PFO will provide quarterly financial reports to the PMU and will also monitor the financial risks identified in Table 22: Financial and Project Risk.

The monitoring of renovation work progress will be mainly through the reporting flows described above, but other sources of information will also support the M&E. These may include:

- verbal communications with individual islands,
- visits to the islands by project staff,
- discussions with CIG agencies involved with the DCCI,
- observations from other climate change project people visiting the island.

PROJECT EVALUATION

The evaluation of the project will be conducted on a quarterly basis against the results framework. It will measure the progress to achieving the targets, outcomes and goal of the DCCI.

The PMU will conduct the evaluation based on the quarterly implementation reports from the PM and PFO. The regular analysis and any findings will provide the information for the annual progress reports, the mid-term review and the terminal evaluation.

The quarterly evaluation will consider any lessons learned that may emerge during implementation and also indicate if any adaptive management actions are required. These may be to address unexpected implementation issues, manage or mitigate project risks, deal with force majeure events, or assess potential opportunities requiring resource allocations.

The PMU will also use the evaluation to remain updated on any grievances, consider the procurement process and outcomes, and ensure ongoing implementation of the GAP.

In the case of the evaluation of the financial monitoring results, this will also support preparing the annual tranche requests. The PFO will be responsible for preparing these requests and for also conducting the annual audit as part of the PPR.

PROJECT REPORTING

As mentioned above the planned quarterly evaluation will support the NIE to meet the evaluation and reporting requirements of the AF.

The content and data of the quarterly evaluation links directly to the required information in the annual PPR which will be overseen by the NIE. The Medium-Term Review may be conducted independently or semi-independently but will be facilitated by the NIE. The Terminal Evaluation must be commissioned as an independent review by a team selected by the NIE.

As well as the AF reporting requirements, the results of the evaluations will also be provided to the team implementing the EDA which has to meet the reporting requirements of the GCF.

MONITORING AND EVALUATION BUDGET

The actions to implement the M&E framework are included as part of the responsibilities of project staff. Accordingly, no Budget column is included in Table 8.1 in Annex Six.

There are some other activities though that will support the M&E framework and these are described in Table 24: Monitoring and Evaluation Budget, with an estimated cost. The total M&E budget is US\$122,000 which is based on the following actions:

- Data collection which would be external to the reporting process such as a survey commissioned to assess household satisfaction.
- Annual workshops to support implementation such as for stakeholder meetings or for capacity-building sessions to share findings.

- Communications across digital media, print and radio.
- Emergency travel during the six years to support M&E.
- Implementing the Gender Action Plan.

Table 24

Monitoring and Evaluation Budget

Item	Budget USD	Notes
Data Collection	\$12,000	6 years @ \$2,000 p/a
Workshops	\$12,000	6 years @ \$2,000 p/a
Communications	\$12,000	6 years @ \$2,000 p/a
Travel	\$30,000	6 years @ \$5,000 p/a
Gender Action Plan	\$56,000	As per Annex Four
TOTAL	\$122,000	

E. RESULTS FRAMEWORK

Table 25: Results Framework sets out the indicators to measure the expected results from the implementation of the DCCI.

BASELINE DATA

In Table 25 there is no baseline data that has been entered as this project has not interacted with the identified households. For the activities under Component One, the results will be based on the holding of the workshops.

For Component Two, there is some indicative data on the conditions of the homes from the MIA survey and the EMCI database, but the definitive baseline will be at the assessment when the application is being completed. At this stage the CFP and the MIA staff on the island will assess the condition of the aspects that the applicant wants to improve. An assessment format will be developed which will facilitate the describing of the house that is going to be upgraded.

TARGETS

The identified target numbers to be achieved by the end of implementation will enable an accurate assessment of the success of the project. There will also be other data generated by the project to describe the completed activities. This data will include:

- the number of houses with roofs replaced,
- the area of the roof replaced (quarter, half, 3-quarters, full),
- the number of houses with roofs tied down,
- the number of houses with, and the total number of windows and shutters installed,
- the number of houses with accessibility issues addressed and the type of assistance provided e.g. ramp, rails, concrete path, toilet or shower installed,
- the number of septic tanks repaired or replaced,

- the number of houses with water catchment work completed with details on the length of guttering, number of water tanks, and the volume of water tanks.

OTHER

Based on the indicators, the progress toward the targets will be assessed every three months. This timing is described in Annex Six along with the project staff responsible for the collection of the data.

The project Milestones are set out in Table 5 in Part One of the proposal. As well as those, some of the other implementation milestones will include:

- completing the workshops under Component One,
- receiving the submissions from each island,
- completing the procurement phase of the project,
- completing the renovation work on an island-by-island basis.

Table 25
Results Framework

Expected Results	Indicators	Baseline	Target	Data Sources
<u>Outcome One</u> Increasing the capability of island communities to manage their adaptation projects	Number of Island Governments participating in implementation of DCCI	Zero	11 Island Governments	CAM Monthly reports, Quarterly reports
Output 1.1 Capacity Built of local institutions involved in DCCI.	Number of Island Government agencies represented in workshop with participants disaggregated by gender, age.	Zero	Six per island	Workshop reports
	Number of non-IG agencies and groups disaggregated by gender, age.	Zero	Three per island	Workshop registration
Output 1.2 Island community workshops increase participation in DCCI.	Number of Participants disaggregated by gender, age.	Zero	Total of 250 people	Workshop reports
	Number of applications submitted with number of women submitting applications	Zero	430 total applications	Applications, IG minutes, quarterly reports
<u>Outcome Two</u> Increasing the Resilience of Pa Enuu Homes.	Number of homes strengthened	Zero	430 homes	Quarterly reports, terminal evaluation
	Number of people living in strengthened dwellings	Zero	1400 people	Quarterly reports, terminal evaluation

	disaggregated by gender, age.			
Output 2.1 Assessment and evaluation of dwellings completed	Number of houses assessed	Zero	430 dwellings	Assessment reports
Output 2.2 Materials procured received and stored on islands.	Lists of items purchased on Invoices Cargo packing list Inwards stock lists for each island	Zero	11 Islands receive materials	Materials invoices, Procurement tender reports, BOLs, IG records
Output 2.3 Renovation work completed to required standard and assessed.	Number of completion reports Number of houses needing remedial work	Zero Zero	430 completion reports Less than 25% (108) homes	CAM monthly reports, Quarterly reports CAM monthly reports, Quarterly reports
Output 2.4 Waste Management	Record of waste sorted at site Tonnage of waste shipped off island	Zero	100% of homes provide a waste report Less than 100 tonne shipped off islands	CAM Monthly reports, BOLs

F. ALIGNMENT WITH ADAPTATION FUND OUTCOMES

There are two project objectives described in Table 26: Alignment of Project Objectives and Outcomes with Adaptation Fund Results Framework, which both support progress towards achieving the overall goal.

Table 26

Alignment of Project Objectives and Outcomes with Adaptation Fund Results Framework

Project Objectives	Project Objective Indicators	Adaptation Fund Outcome	Adaptation Fund Outcome Indicator	Grant Amount (USD)
To strengthen the awareness of adaptation and climate risk reduction processes at community level.	Number of island-level organisations involved in design and implementation of this project.	Outcome 3: Strengthened awareness and ownership of adaptation and climate risk reduction processes at local level	Outcome Indicator: 3.1. Percentage of targeted population aware of predicted adverse impacts of climate change, and of appropriate responses	\$298,500
To increase the resilience of our disadvantaged communities by more direct access to finance for	Number of families receiving financial allocation for island projects.	Outcome 4: Increased adaptive capacity within relevant development sector services and infrastructure assets	Outcome Indicator: 4.2. Physical infrastructure improved to withstand climate change and variability-induced stress	\$4,258,500

island communities in the Cook Islands.				
Project Outcome	Project Outcome Indicators	Adaptation Fund Output	Adaptation Fund Output Indicator	
Increased community participation in climate change adaptation actions.	Number of people attending workshops for the project initiation. Number of applications received for funding assistance.	Output 3.1: Targeted population groups participating in adaptation and risk reduction awareness activities	Output Indicators 3.1.1 No. and type of risk reduction actions or strategies introduced at local level.	
Homes in the <i>Pa Enua</i> are less vulnerable to climate change impacts.	Number of dwellings upgraded to meet building code standard. Number of people with reduced exposure to climate impacts.	Output 4: Vulnerable development sector services and infrastructure assets strengthened in response to climate change impacts, including variability.	Output Indicator 4.1.2. No. of physical assets strengthened or constructed to withstand conditions resulting from climate variability and change (by sector and scale)	

G. PROJECT BUDGET

The total budget for the DCCI is US\$4,999,500. Over 90% of the budget is going directly to implementing project activities. As a result, the percentages for the project execution cost and the project cycle management fees are low. This demonstrates the benefit of being able to collaborate and coordinate the implementation of the DCCI with the implementation of the EDA. Table 27: Project Budget describes the budget broken down to activity level. It is supported by Table 28: Budget Notes.

Table 27
Project Budget

Outcomes / Outputs		Budget Notes	Detailed Budget (in US\$)					Total Budget (per outcome)	
			Budget Categories choose from the drop-down list	Unit	# of Unit	Unit Cost	Total Budget (per budget category)		
OBJECTIVE 1 - CAPACITY BUILDING									
Comopnent 1 Capacity Building and Awareness Raising of Island Communities	1.1 Capacity Built of local institutions involved in DCCI.	A	Consultant - Individual - Local	Months	24	4,000.00	96,000.00	180,500.00	
		B	Audio Visual & Printing	Lumpsum	1	2,000.00	2,000.00		
		C	Workshop/Training	Days	22	1,000.00	22,000.00		
		D	Travel – Local	Plane Trip	10	700.00	7,000.00		
		E	Travel – Local	Plane Trip	2	7,500.00	15,000.00		
		F	Per-Diems	Days	110	100.00	11,000.00		
		G	Accommodation	Nights	110	250.00	27,500.00		
	1.2 Island community workshops increase participation in DCCI.	A	Consultant - Individual - Local	Months	24	4,000.00	96,000.00	118,000.00	
		C	Workshop/Training	Days	22	1,000.00	22,000.00		
	OBJECTIVE 2 - RESILIENT HOMES								
Component 2. Increasing the Resilience of Pa Enua Homes.	2.1 Assessment and evaluation of dwellings completed	O	Consultant - Individual - Local	Focal Points	6	46,666.67	280,000.00	4,127,500.00	
	2.2 Materials procured received and stored on islands.	H	Building Materials	Lumpsum	1	3,681,000.00	3,681,000.00		
	2.3 Renovation work completed to required standard and assessed.	C	Workshop/Training	Days	10	1,000.00	10,000.00		
		D	Travel – Local	Plane Trip	10	700.00	7,000.00		
		E	Travel – Local	Plane Trip	2	7,500.00	15,000.00		
		F	Per-Diems	Days	110	100.00	11,000.00		
		G	Accommodation	Nights	110	250.00	27,500.00		
		A	Consultant - Individual - Local Project Manager	Months	24	4,000.00	96,000.00		
	2.4 Waste Disposal	I	Waste Removal	Lumpsum	1	83,000.00	83,000.00		131,000.00
		A	Consultant - Individual - Local Project Manager	Months	12	4,000.00	48,000.00		
Total Project Activities Cost								4,557,000.00	
Projec Execution Cost - 2.9%	R	Mid-term Review	Lumpsum	1	5,000.00	5,000.00	Actual amount and % of PMC requested: 134,000.00	Maximum PMC that can be requested:	
	Q	Office Supplies	Lumpsum	1	5,000.00	5,000.00			
	M	IT Equipment	Laptop	1	1,500.00	1,500.00			
	S	M and E Framework	Lumpsum	7	17,500.00	122,500.00			
Total Project Cost									
Project Cycle Management Cost - 6.6%	J	Consultant - Individual - Local	Months	84	3,000.00	252,000.00	308,500.00		
	L	Audit Fee	Lumpsum	7	5,000.00	35,000.00			
	Q	Office Supplies	Lumpsum	1	5,000.00	5,000.00			
	M	IT Equipment	Laptop	1	1,500.00	1,500.00			
	N	Terminal Evaluation	Lumpsum	1	15,000.00	15,000.00			
GRAND TOTAL BUDGET								4,999,500.00	

Table 28
Budget Notes

Budget Note	Detailed Description
A	One Local consultant (Project Manager) for 7 years duration of programme @ \$4000 per month A Project Manager based in the CCCI office will manage and coordinate implementation of activities. They will largely be responsible for implementing the entire project as well as overseeing progress and project managing to ensure all activities are successfully completed. S/he will provide technical advice to the project and will provide quarterly progress project reports to MFEM. They will also assist the NIE in completing progress report and completion report that is due to AF. The predominate role of the PM is to implement the outputs across all activities of this programme hence the reason the budget to cover the cost of the PM is split across all activity budget line items.
B	Budget is for awareness materials and workshop printing and resources in order to roll out the workshops
C	Workshop - The cost per workshop is at \$1,000: - \$400 Lunch, \$250 morning tea, \$200 venue hire internet costs, \$150 sound system hire/chairs/table hire Note there will be x2 workshop days for 1.1 and another 2 workshop days for 1.2
D	This cost is for the PM and PFO to travel to the Southern Group Islands of Aitutaki, Mangaia, Ngaputuru (Mauke, Atiu, Mitiaro) on the local domestic Airline - total of 5 islands The trip costs is: 2 people x \$700 (round trip) is \$1400 per trip. There will be 5 trips in total for the southern group islands and traveling x 2 times.
E	This cost is for 2 PM AND PFO to travel to the Northern Group Islands Pukapuka/Nassau, Manihiki/Rakahunga, Penrhyn, Palmerston on the local domestic Airline The trip costs is: 2 people x \$7,500 (round trip) - total is \$15,000 for a total of two trips
F	The cost is for the per-diem per travelling focal point of \$100 per day for 110 days (covering 11 islands for 2people for 5 days per trip) - for two trips in accordance to the CIG travel policy rates - For outer island travel, we do not use the UN rates, we use the cook islands government travel policy for outer islands which is a daily allowance of \$100 which only covers food, incidentals, transport, it does NOT cover Accommodation. This is usually covered separately.
G	The cost is for the accommodation per travelling focal point of \$250 per night for 110 nights - 5 trips for southern group islands and 6 islands in northern group islands for 2 people over a 5 days period per island) - there will be x2 trips in total
H	Building Materials Important to note tha shipping of these materials and labour will be covered under complementary project EDA, this budget is only for Building materials. The total budget is \$3,681,000 allocated forwards building materials however its important to note that within this amount, we have applied a remedial works budget of 200 per home and inflation adjustment of 3% over the project life. Total Budget \$3,681,000 less \$3,4830,000 is \$198,000 Of that balance - 430 applicants x 200 per applicant for remedial work is \$86,000 and the balance of 198,000 less 86000 is \$112,000 which is the 3 % inflation over time.
I	This is for waste removal of old material from old homes that will be renovated in the outer islands. This will cover the collecting and shipping of these materials back to the capital island rarotonga for waste disposal as the outer islands do not have sufficient waste removal facilities
J	This is the PFO (Accounts and Finance consultant) who is responsible for full financial management and implementation of funding in in line with the grant agreement of this project for the duration of the project.
L	This is the cost for external audits at \$5000 per audit for 7 audits
M	This is the cost for laptops at \$1,500 each - one for the Finance Officer AND Project Manager Consultant
N	Terminal evaluation is mandatory to complete this project, this funding is for an independent consultant to carry out a full TE of the project at the end of the project
O	This Budget is to support the x6 Focal points in the outer islands funded as parttime roles under the complementary EDA project. This funding till increase their time and the position to a full time role rather than a parttime role and this is to ensure they can implement associated activities from EDA as well as this AF project in the Pa Enea Outer Islands
Q	Start up Office Supplies One off purchases at beginning of programme - \$10,000 - Projector x2 for workshops at \$1000 each, total of \$2000 - Office desks x2 at \$1000 each - \$2000 - Hard drives - \$500 each x2 - \$1000 - Office Printer at \$2000 x2 - \$1,000 Tonner/Ink x2 - \$2,000 - Filing Cabinets x2 \$500 each, \$1000 in total
R	This cost is for to cover the mid term review workshops and associated fees
S	This cost is for the Monitoring and Evaluation of the project as well as the GRM function at a cost of \$17500 per year - Refer to budget breakdown in project document, table 24 - M and E Budget.

FUNDING FLOWS

Funding from the AF will be held in an account managed by DCD. Funds from there will be transferred as required into a DCCI Operational account from which all project related disbursements will occur. The facilitating of the operational account will be the responsibility of the PFO and overseen by the PMU.

Funds from the separate GCF account at DCD will also be transferred into the Operational account to support the Tier One implementation of the EDA. The costs to manage the procurement, transport the materials to each island and store them on the island will be paid directly by the EDA. The work-gangs on each island will also be paid directly by the EDA. None of these costs have been budgeted for under the DCCI⁶³.

Through the FMIS, the estimated budget for each island can be an individual cost centre with associated works orders. Invoices raised against those work orders will be verified on-island before being sent to CCCI to be loaded into the FMIS. Transfer of funds into the suppliers account will be approved by CCCI and DCD.

H. DISBURSEMENT SCHEDULE

Table 29: Disbursement Schedule sets out the estimated annual tranche funding based on the total project budget.

Table 29
Disbursement Schedule

Item		Annual Tranche						Totals
Year	Signing	2	3	4	5	6	7	
Project Funds	491,200	680,400	746,800	746,800	730,200	663,800	497,800	4,557,000
EE Fee	14,446	20,011	21,963	21,956	21,468	19,516	14,640	134,000
NIE Fee	42,245	44,590	49,815	49,822	48,516	43,290	30,221	308,500
Total	547,891	745,001	818,578	818,578	800,184	726,606	542,662	4,999,500

The initial payment on signing the agreement supports the implementation of the activities described in Figure 12 Establishment Phase and is approximately 11% of the total budget. The subsequent annual tranche amounts are a combination of estimated project implementation cost and the EE/NIE fees.

The project funds in the tranche requests are calculated from the number of houses to be renovated each year plus the project staff salaries. An example is the Year Three amount of US\$746,800 is an estimate of 80 houses x \$8300 = US\$664,000, plus salaries of US\$82800. The estimated maximum number of houses to be renovated in one year is 80.

The EE/NIE fee is a percentage of the annual project cost and the total equals the combined

⁶³ Insurance of the materials once stored on-island has been confirmed.

project execution cost and the project cycle management fee.

PART IV: ENDORSEMENT BY GOVERNMENT AND CERTIFICATION BY THE IMPLEMENTING ENTITY

A. Record of endorsement on behalf of the government⁶⁴

Provide the name and position of the government official and indicate date of endorsement. If this is a regional project/programme, list the endorsing officials all the participating countries. The endorsement letter(s) should be attached as an annex to the project/programme proposal. Please attach the endorsement letter(s) with this template; add as many participating governments if a regional project/programme:

Wayne King, Director, Climate Change Division, Office of the Prime Minister, Cook Islands.	Date: 16 July 2026
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B. Implementing Entity certification

Provide the name and signature of the Implementing Entity Coordinator and the date of signature. Provide also the project/programme contact person's name, telephone number and email address.

I certify that this proposal has been prepared in accordance with guidelines provided by the Adaptation Fund Board, and prevailing National Development and Adaptation Plans and subject to the approval by the Adaptation Fund Board, commit to implementing the project/programme in compliance with the Environmental and Social Policy and the Gender Policy of the Adaptation Fund and on the understanding that the Implementing Entity will be fully (legally and financially) responsible for the implementation of this project/programme.

Name & Signature



Mani Mate

Implementing Entity Coordinator

Date: July, 16, 2026

Tel. and email: +682 59521;
mani.mate@cookislands.gov.ck

Project Contact Person: Tessa Vaetoru

Tel. And Email: +68229521,
tessa.vaetoru@cookislands.gov.ck

⁶⁴ Each Party shall designate and communicate to the secretariat the authority that will endorse on behalf of the national government the projects and programmes proposed by the implementing entities.

ANNEX ONE: MINISTRY OF INTERNAL AFFAIRS SURVEY FORM



Customer Survey

Full Name _____ Age _____ Contact Phone _____

Address _____ Gender ☐ Male ☐ Female

Do you require assistance to improve your home? ☐ Yes ☐ No

Type of home improvement you require? *(Please tick from list below)*

☐ Roofing ☐ Water tank ☐ Water fittings

☐ Water access ☐ Sewage system

☐ Other (Please specify) _____

Do you own your home? ☐ Yes ☐ No

How many people in your household? _____ Children (under 18) _____ Adult (19+)

Anyone in your household receiving income from these sources? *(You can tick more than 1)*

☐ Employment ☐ New Zealand Pension ☐ Destitute Benefit

☐ Cook Islands Pension ☐ Infirm Benefit ☐ Caregiver Benefit

☐ Child Benefit

What is your household annual income? _____

Have you received SAF support from INTAFF? ☐ Yes ☐ No

If additional support is available for your home, would you apply for a grant by completing an application form? ☐ Yes ☐ No

Would you need assistance to complete an application form for a grant? ☐ Yes ☐ No

If a grant is not available would you be interested in applying for a loan to improve your home?? ☐ Yes ☐ No

Do you have any suggestions for how we can improve our service? (Open-ended response)

Thank you for taking the time to complete our questionnaire to support the initiative of the Cook Islands Government in improving the life of those most vulnerable.

Your feedback will help us improve our product/service.

ANNEX TWO: WASTE REDUCTION AND MANAGEMENT PLAN

INTRODUCTION

There will be waste generated from the implementation of the renovation works on the houses as part of the DCCI and there is limited or no ability to process waste on the islands in the *Pa Enua*. The normal management for this type of solid waste in the *Pa Enua* is to dispose of the waste in a dump where it will be burnt.

The aim of this plan is to apply the waste hierarchy: **Reduce, Reuse, Recycle, and Dispose**. Our goal will be to divert at least 90% of renovation waste from landfills. This model prioritises waste avoidance and reduction methods, before reuse, recycling, and final disposal.

This plan is aligned with the Cook Islands Solid Waste Management Policy 2016 - 2026⁶⁵.

APPLICATION

Waste Minimization

Due to the shipping cost, there will not be an option to return unused materials to suppliers. Accurate calculations of material quantities, with an appropriate surplus, will be necessary and this will help to minimize the waste generated on each island.

Once suppliers are approved, the Project Manager (PM) and Project Support Officer (PSO) will engage with them to discuss the packaging of materials for shipping to each island. Cargo pallets are normally shrink-wrapped in plastic for extra protection and suppliers will be asked to take measures to minimize the wrapping without compromising the safety of materials.

Reuse and Recycle

During preparation and de-construction, builders will be required where possible to salvage timber, doors, cabinets and any fixtures so they can be re-used.

As the renovation work progresses, builders will sort any waste and separate them accordingly. Bins will be provided to secure the plastic to prevent wind-blown litter. Roofing iron and metal can be placed on a pallet and tied down.

Table C.1 Material Management Stream describes the materials and the action that will be taken to sort and manage the waste. Most of the waste materials can be reused on each island. Cardboard for example is popular for use on *taro* swamp plantations⁶⁶.

Plastic includes wrapping, used pipes and guttering, and old tanks as well as cut-offs from new materials. Metals include old materials such as roofing and louvre frames as well as cut-offs from new materials. Both plastic and metal can be packaged up and sent to Rarotonga for recycling.

Table 3.1

Material Management Stream

⁶⁵ ICI, 2016.

⁶⁶ Taro is a starchy root vegetable.

Material	Stream	Management Action
Concrete/ Brick	Reuse	Crush on-site for aggregate or use for fill on-island.
Clean Wood	Reuse	Kept and re-used on island
Metal	Recycle	Separate and pack for shipping to Rarotonga for recycling.
Drywall/Gib	Reuse	Crush on-site for aggregate or use for fill on-island.
Plastic	Recycle	Compact and send to Rarotonga for recycling.
Cardboard	Reuse	Re-use on island.

Disposal

Discussions with a recycling company in Rarotonga indicate that the plastic material will be shredded and compacted for export. The metal will be consolidated into containers for export as well.

There will be no hazardous materials in what is shipped to each island, but there may be some identified as part of the deconstruction. Training on the handling of these is included in the upskilling course at the CITTI. They will be wrapped on a pallet and stored until a separate arrangement for them is organised by the CIG.

RESPONSIBILITIES

Contract Activity Manager

The Contract Activity Manager (CAM) on each island will work with the lead Builder or site Supervisor at each building site on the island to make sure that waste is being managed. The homeowner will have the first option to retain any of the materials and it is likely that the concrete, wood and cardboard will be retained in most cases.

The CAM will also coordinate with the IG for the collection and storage of the waste materials. A Waste Log will be kept by the CAM of the type and weight of materials that are removed from each site.

Island Government

The IG will on a regular basis collect the metal and plastic waste. It will be stored at a location until the inter-island ship can pick up the materials for shipping to Rarotonga. Plastic waste will be compacted into large wool bags. Light metal scrap can also be packed into wool bags and larger metal can be tied onto pallets.

Project Manager

The PM will coordinate the movement of the waste materials from all the *Pa Enua* islands with the Rarotonga-based recycling centre for the receiving of the plastic and metal.

ANNEX THREE: DRAFT TERMS OF REFERENCE

BACKGROUND

Both of the project management positions under the DCCI will be filled through a public Request for Quotes (RFQ) process which will be compliant with the CIG Procurement Policy. A full Terms of Reference for each position will be developed as part of the RFQ process, but a description of the main responsibilities are provided below.

Project Manager

Carry out the functions of the Project Manager for the implementation of the Adaptation Fund LLA project including:

- Coordination of all DCCI project activities for the Executing Entity (CCCI) according to the signed Letter of Agreement (LOA) between MFEM and CCCI.
- Support and assist as required the Island Governments with their responsibilities as part of the DCCI project.
- Assist the Director CCCI with representation on the PMU for the DCCI project.
- Ensure coordination of implementation of the DCCI with the EDA project.
- Manage and coordinate the six Climate Focal Points employed under the DCCI.
- Work closely with the Project Finance Officer and the National Implementing Entity (MFEM) to ensure efficient and effective implementation of the DCCI.

As part of those functions, some specific activities will be;

- Working in coordination with the Project Coordinator of the Tier One activities of the EDA.
- Developing and disseminating project promotional materials including supporting outreach to potential applicants in the Pa Enua to ensure they understand the application process, the eligibility requirements and the benefits of upgrading housing and community buildings to meet the 2019 building code.
- Assisting in the translation of DCCI products and information under the project into Cook Islands Maori language.
- Assisting the Island Governments with the funding application process, and with the storage and distribution of materials.
- Managing and assisting the Climate Focal Points with the implementation of activities on each island.
- Managing all the procurement required to support implementation of the DCCI.
- Leading the implementation of the M&E framework for the DCCI including compiling the lessons learned.
- Monitoring and managing project, financial, social and environmental project risks and conducting quarterly risk assessment update.
- Facilitating the grievance redress process.
- Preparing and submitting project reports to meet agreed timelines.

The Project Manager will report to the CCCI Director and be based in the Climate Change Cook Islands Office within the Office of the Prime Minister from Monday to Friday, 8-4pm week days.

Project Finance Officer

Carry out the functions of the Project Finance Officer for the implementation of the Adaptation Fund LLA project including:

- Executing financial and accounting operations for the DCCI in accordance with the Adaptation Fund grant agreement.
- Working in coordination with the Project Manager for the DCCI to ensure effective and efficient implementation of the DCCI project activities.
- Facilitating the Works Payments process to support timely implementation of the work schedule.
- Complete the financial reporting requirements as part of the quarterly and annual reporting schedule.
- Support and assist as required the Island Governments with their responsibilities as part of the DCCI project.
- Assist the Director DCD with representation on the PMU for the DCCI project.
- Support coordination of implementation of the DCCI with the EDA project.
- Carry out any other activities for the National Implementing Entity (MFEM) to ensure efficient and effective implementation of the DCCI.

As part of those functions, some specific activities will be;

- Regularly monitor the financial implementation of the project within the approved budget and within MFEMs policy and procedures.
- Prepare financial updates, reports and analysis for the project and make recommendations on financial matters for the project.
- Arrange annual project audits of and implement internal control measures recommended by the auditor.
- Supporting the development of RFQ and Tender documents as part of the Procurement process.
- Assisting the Island Governments with the funding application process, and with the preparation and payment of invoices.
- Monitoring and managing financial and project risks.
- Assisting with lessons learned particularly from the financial side.
- In conjunction with the PM, facilitating the meetings of the PMU.
- Support the functioning of the grievance redress mechanism.
- Supporting the submitting of project reports from the NIE to the AF and facilitating the annual tranche request from the NIE.

The Project Finance Officer will report to the DCD Director and be based in the Development Coordination Division within the Ministry of Finance and Economic Management, from Monday to Friday, 8-4pm week days.

ANNEX FOUR: GRIEVANCE REDRESS MECHANISM AND WHISTLEBLOWER PROCEDURE

A Grievance Redress Mechanism (GRM) will be put into place for the duration of the DCCI implementation. This will be available to workers in the project and the communities where work is being undertaken. The GRM is designed to be culturally appropriate, accessible, confidential, and without retribution. Stakeholders will be informed about the GRM during the island workshops and consultations and through communications material.

PROJECT LEVEL GRIEVANCE

The NIE, through the PMU will establish a dedicated project level grievance redress mechanism to manage and respond to concerns, grievances, and complaints that arise from project activities. Depending on the type of grievance, there will be different options available. The DCCI project will use the established and operational complaints procedure of MFEM, which is publicly available on its website (<https://www.mfem.gov.ck/development/national-systems/grants-award-system#grant-complaints-process>).

The grievance process begins when a member of the public fills out a complaints form, which can cover environmental, social, financial and administrative complaints. Depending on the grievance, the PMU will categorize the complaint, share it with the NIE relevant evaluation team, track the process and communicate the outcome to the complainant. Concerns, complaints and grievances by affected persons directed to the PMU will be received by the Project Manager who will be the person to receive, record, review, and address concerns in coordination with relevant stakeholders depending on the nature of the complaint.

A complaints register will be maintained to record the date, details, and nature of each complaint, the name of the complainant, and the date and actions taken as a result of the follow-up investigation. The register will also cross-reference any non-compliance report and/or corrective action report or other relevant documentation relating to the complaint.

Table 7.1 Grievance Redress Process presents the steps and corresponding time frame for the GRM.

The process recognises that there may be changes on who might be involved in hearing the grievance and representation of ethnicities and indigenous people focal point may be required. At the inception workshop, information summarising the GRM process and governance including contact details of the PMU and grievance form will be provided.

The Project Level GRM does not prevent any affected person from accessing the MFEM institutional level GRM or seeking redress through the Courts.

Table 7.1**Grievance Redress Process**

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

If the grievance is not resolved to the satisfaction of the party raising the complaint at the MFEM institutional level, they can escalate their concerns externally to the Office of the Ombudsman or the Cook Islands Audit Office. For specific internationally funded projects (like AF), grievances can also be forwarded to the independent redress mechanism of that funding body

GENDER DISCRIMINATION/GENDER BASED VIOLENCE

Grievances, issues and concerns related to Gender based Violence (GBV) and Sexual Exploitation, Abuse and Harassment (SEAH) will be managed through this GRM process but will be implemented with the additional survivor centred measures that will include:

- The rights, needs and wishes of the survivor or victim is paramount
- Safety of the survivor will always be ensured with potential risks to the survivor identified and action taken to ensure the survivors safety and prevent further harm
- All actions should reflect the choices of the survivor
- All information will be confidential, and identities will be protected
- All actions should reflect the choices of the survivor and the survivor must provide informed consent to progress with each stage of the complaints process.

Punanga Turuturu Itivaine (PTI) is an independent support centre for Cook Islands Women. PTI is the MFEM's partner across all projects and programmes, but with a specific focus on matters related to GBV/SEAH. If a complaint is of this nature, it can be raised directly with PTI or through the standard grievance process.

Their role will be to assess the complaint and if it can be resolved, to put this in place. If it is more serious, then PTI will make a recommendation to the PMU for further action which may involve legal action. PTI can also offer counselling and support to the affected parties.

The project GRM will ensure accessible, culturally appropriate and survivor informed channels for stakeholders to raise issues, enhancing accountability in project implementation. This approach reaffirms the NIE's commitment to observing the highest ethical legal and morals standards in any project that it implements.

WHISTLEBLOWING PROCEDURE

A general whistleblowing procedure is also in place to protect people who may denounce fraud and corruption concerns anonymously.

In accordance with its External Communications Policy, Environmental and Social Safeguard Framework, Antifraud and Anticorruption policy, MFEM has set up a whistleblowing procedure which directly involves the Cook Islands Audit Office (CIAO), and the Public Expenditure Review Committee (PERC). Hence, any individual who becomes aware of any reprehensible practice related to fraud, corruption, wrongdoing, collusion or any similar act, shall report with all confidentiality to the CIAO, who shall examine the complaint and refer to the PERC for directions on investigation.

This whistleblowing procedure is also aligned to the Cook Islands Government Whistleblowing Policy, Cook Islands Government Financial Policies and Procedures Manual, Cook Islands Government Procurement Policy, and Public Expenditure and Review Committee and Audit Act 1995

ANNEX FIVE: MONITORING AND EVALUATION

Table 8.1
Project Monitoring

Expected Results	Indicators	Baseline Data	Targets	Data Sources	Data Collection Methods	Frequency	Responsibility
<u>Outcome One</u> Increasing the capability of island communities to manage their adaptation projects	Number of Island Governments participating in implementation of DCCI	Zero	11 Island Governments	CAM Monthly reports, Quarterly reports	Reviewing project Reports	Quarterly for project duration	Project Manager
Output 1.1 Capacity Built of local institutions involved in DCCI.	Number of Island Government agencies represented in workshop with participants disaggregated by gender, age.	Zero	Six per island	Workshop reports	Reviewing project Reports	Monthly in first 18 months	Project Manager
	Number of non-IG agencies and groups disaggregated by gender, age.	Zero	Three per island	Workshop registration	Reviewing project Reports	Monthly in first 18 months	Project Manager
Output 1.2 Island community workshops increase participation in DCCI.	Number of Participants disaggregated by gender, age.	Zero	Total of 250 people	Workshop reports	Reviewing project Reports	Monthly in first 18 months	Project Manager
	Number of applications	Zero	430 total applications		Reviewing project Reports		Project Manager

	submitted with number of women submitting applications			Applications, IG minutes, Quarterly reports		Quarterly for project duration	
<u>Outcome Two</u> Increasing the Resilience of Pa Enea Homes.	Number of homes strengthened	Zero	430 homes	Quarterly reports, Island visits, Terminal evaluation	Reviewing project Reports	Quarterly for project duration	Project Manager
	Number of people living in strengthened dwellings disaggregated by gender, age.	Zero	1400 people	Quarterly reports, Terminal evaluation	Reviewing project Reports	Quarterly for project duration	
Output 2.1 Assessment and evaluation of dwellings completed	Number of houses assessed	Zero	430 dwellings	Assessment reports	Reviewing project Reports	Quarterly for project duration	Project Manager
Output 2.2 Materials procured received and stored on islands.	Lists of items purchased on Invoices Cargo packing list Inwards stock lists for each island	Zero	11 Islands receive materials	Materials invoices, Procurement tender reports, BOLs, IG records	Reviewing project Reports	Monthly Quarterly	Project Manager
Output 2.3 Renovation work completed to required standard and assessed.	Number of completion reports	Zero Zero	430 completion reports	CAM monthly reports, Quarterly reports	Reviewing project Reports	Quarterly for project duration	Project Manager

	Number of houses needing remedial work		Less than 25% (108) homes			Quarterly for project duration	
Output 2.4 Waste Management	Record of waste sorted at site	Zero	100% of homes provide a waste report	CAM Monthly reports,	Reviewing project Reports	Quarterly for project duration	Project Manager
	Tonnage of waste shipped off island	Zero	Less than 100 tonne shipped off islands	BOLs		Quarterly for project duration	



ADAPTATION FUND



Kōutu Mana Tōtara o Te Ipukarea
Office of the Prime Minister



LETTER OF ENDORSEMENT

TO: The Adaptation Fund Board
c/o The Adaptation Fund Secretariat
E-Mail: submissions@adaptation-fund.org

23 July 2026

Subject: Endorsement for the Project Submission of *Increasing the Resilience of Disadvantaged Communities in the Cook Islands*.

In my capacity as Designated Authority for the Adaptation Fund in the Cook Islands, I confirm that the above national project proposal is in accordance with the Cook Islands Government's national priorities in implementing adaptation activities to reduce the adverse impacts of, and risks posed by, climate change in the Cook Islands.

Accordingly, I am pleased to endorse the above project proposal for consideration by the Adaptation Fund. If approved, the project will be implemented by the Ministry of Finance and Economic Management and executed by the Climate Change Division of the Office of the Prime Minister.

Sincerely,

Mr. Wayne King,
Director, Climate Change Division,
Office of the Prime Minister,
Cook Islands.

Designated Authority for the Cook Islands to the Adaptation Fund

COMMUNITY CONSULTATIONS

INITIAL SURVEY DATA

The initial stakeholder consultations began in March 2025, when the Ministry of Internal Affairs conducted a survey to collect data on socio-economically disadvantaged families across Rarotonga and the *Pa Enua*. The data was to support the development of the GCF funded EDA project and the families were identified from the MIA registry of vulnerable families¹.

The survey was responded to by 721 people (354 females and 367 males), representing households that contained a total of 1923 people. Of the 721 responses, 371 were from people based in the *Pa Enua*. The survey gathered information on household population, income, and construction. It also asked the responder to identify areas of their house that needed renovation. The survey form is attached as Annex One.

Based on the data from the survey, the MIA identified the highest priority for climate resilience support as:

- Low-income households with minimal income sources.
- Elderly individuals living alone, or those with physical or mobility limitations.
- Families with children living in destitute conditions.
- Households in the *Pa Enua*, where service access is more limited.

EDA CONSULTATIONS

Extensive multi-stakeholder consultations were undertaken across islands for the development of the EDA during 2024/25. On each island the meetings involved traditional leaders, community organizations, and local government. These meetings discussed the scope of the EDA components including the Tier One window which would be for the most disadvantaged.

Particularly relevant for the DCCI was the Pa Enua Forum meeting in July 2025. Approximately 40 participants from all the *Pa Enua* islands including Mayors and Executive Officers² (EO) as well as government stakeholders were in attendance. Along with other CCCI projects, the participants were consulted on the proposed EDA and advised of the upcoming AF proposal.

The favourable response by all the *Pa Enua* representatives was based on an appreciation of the direct impact the EDA activities will have on their respective communities. Some comments were made on the cap per applicant as well as the scope of eligible activities and these have been taken into account in the design of the DCCI.

COMMUNITY CONSULTATIONS

During pre-planning for this project in the CCCI office, the area of focus for activities was refined to be only the *Pa Enua* and excluded Rarotonga. The communities on each island had already been consulted on the Tier One access to funding as part of the EDA engagements and were

¹ The registry is of socio-economically vulnerable families as defined by the MIA.

² The Mayor leads the elected local government on each island while the Executive Officer is in charge of all the workers from the CIG agencies on the island.

therefore familiar with the rationale of supporting the disadvantaged.

To strengthen the understanding, a series of consultations and stakeholder engagements have been conducted with the focus only on the *Pa Enua* communities and becoming more island specific in the engagement. Table 12: Pa Enua Stakeholder Consultations by Island shows the location, date and number of people consulted during the visits to the *Pa Enua* islands. Visits were conducted to Mauke and Aitutaki in October and November of 2025. Meetings were held on Mitiaro and Atiu in early 2026.

Table 12
Pa Enua Stakeholder Consultations by Island

Island	Date	Number Consulted
Mauke	22/23 October 2025	22
Aitutaki	25/26 November 2025	22
Mitiaro	14/15 April 2026	13
Atiu	28/29 April 2026	30
Penrhyn	13 July 2026	
Manihiki/Rakahanga	15 July 2026	
Pukapuka/Nassau	17 July 2026	
Mangaia	18 August 2026	

Due to airline logistics issues, the consultations with all the Northern Group island communities were delayed to July 2026. The final consultation will be on Mangaia in August 2026.

On each island, meetings were held with the Mayor, Councillors and staff of the Island Government, NGOs and the general community. These meetings re-enforced awareness generated from the *Pa Enua* Forum and EDA consultations and focused on the proposed activities to support the most disadvantaged households.

Site visits were also arranged to the houses of families who may participate in the project on Aitutaki and Mitiaro. The case studies included in Part II-B are based on these site visits.

The only inhabited island that was not visited was Palmerston as there is no scheduled sea or air transport. The Mayor and EO were consulted at the Pa Enua Forum.

Not including the EDA engagements, the total number of people consulted to date is 523. Of the people consulted, 275 are women and 247 are men. One was unassigned.

This will be added to once the second round of island consultations are completed.

Figure 10
Stakeholder Consultation on Mauke Island



GOVERNMENT AGENCIES

Several meetings have been held with the MFEM who will be the NIE for the DCCI. As the MFEM is also the Accredited Entity for the GCF funded EDA project, these meetings were crucial to ensuring the separation but coordination of the DCCI and EDA.

Meetings were also conducted with CIG agencies that will be involved with the project. Staff from the MIA, ICI, EMCI, were met with on different occasions to gather data and to discuss implementation. The MIA model of implementation for the Special Assistance Fund was utilized as the basis for the design of the DCCI activities. The EMCI database gave more information on vulnerability aspects of households.

Several meetings with ICI were held as part of the design phase of the project. The quality of the renovation work for the disadvantaged families homes will be guided by the Building Code 2019. On each island, the Infrastructure staff will assist with the logistics around storage and transportation of the materials to each work site.

Information from the agencies involved, the island governments and the direct potential beneficiaries have been incorporated into the design. The island visits and direct contact with the potential beneficiaries enabled the survey data to be verified and updated. These

discussions also led to the scope of activity being revised and broadened for the project to include accessibility.

Stakeholder consultation will be ongoing during implementation beginning with inception missions to all the islands in the *Pa Enua*. There will be a CFP for each island who will be the point-of-contact for participating families and they will be the focus for the ongoing stakeholder engagement. That person will also work closely with the Island Government and communicate regularly with the PM for the DCCI.

ENVIRONMENTAL AND SOCIAL RISK MANAGEMENT

RISK ASSESSMENT

Based on the screening process against the checklist of project risks, and the more specific risk assessment process described above in Part III-B, there has been nothing identified as a major environmental or social risk for the implementation of the project.

Table 22: Environmental and Social Risk lists some potential low risks from the project activities. The measures necessary to avoid, minimize, or mitigate those potential environmental and social risks are discussed further below.

Table 22

Environmental and Social Risk

ENVIRONMENTAL RISKS	RISK LEVEL	RISK MANAGEMENT	MONITORING
Building waste	L	Waste Management Plan	CAM, PM
Septic tank seepage	L	Safety procedures	CAM, PM,
SOCIAL RISKS	RISK LEVEL	RISK MANAGEMENT	MONITORING
Disruption of families during renovation work	L	Scale of work, plenty of time to plan	CAM, CFP, PM
Gender Discrimination	L	Project design is gender sensitive and project implementation gender responsive. Awareness of GRM process.	CAM, CFP, PM

Building Waste

There will be waste generated by the storage and usage of building materials on the *Pa Enua* islands. Procedures have been designed which will be applied on each island to manage the flow of waste. This has been set out in detail in Annex Two: Waste Reduction and Management Plan.

Septic Tank Seepage

Through the CITTl, with funding from the EDA, there will be training provided for contractors who intend to be a service provider for the EDA and DCCI. Part of that training will include sanitation assessment and handling procedures for upgrading septic tanks. Ensuring that workers have the correct health and safety gear when repairing or replacing septic tanks will be part of the process.

Disruption of Families

Although the majority of the work will be small-scale, there may be some disruption to the

families in the house. Families will be consulted when the implementation schedule for their island is being confirmed and they will have time to make arrangements for a temporary move if required.

Gender Discrimination

The risk for the DCCI is that gender discrimination prevents every participant from receiving the benefits of the project equally. A Gender Assessment has been carried out and is described in Annex Four: Gender Action Plan. The findings are incorporated into the project design to ensure that the DCCI provides for equal participation and benefits regardless of gender.

A Grievance Redress Mechanism (GRM) will be established and awareness of the process promoted through the island workshops. More detail on the GRM is in Annex Five: Grievance Redress Mechanism and Whistleblower Procedure.

GENDER EQUALITY

The gender assessment and Gender Action Plan (GAP) have been developed for the DCCI project in alignment with the AF Gender Policy. These documents were developed through a process combining a comprehensive literature review and extensive stakeholder consultations. The stakeholder consultations were conducted during 2025 and 2026 in both English and Cook Islands Māori. Stakeholder engagement included women's groups, community leaders, public agencies, and private sector representatives in Rarotonga and the *Pa Enua*.

Pa Enua Social Context

The Cook Islands is making progress in advancing gender equality¹. Part of this is influenced by changing gender roles overseas as women move out of historically segregated, nurturing, or administrative roles. There are also shifting population demographics driving change in the *Pa Enua* as families have to adapt to less people being available to carry out normal family functions.

There is still an income gap nationally as average annual income is \$20,209 for males and \$18,348 for females, but this has narrowed considerably since 2006². Women are becoming much more visible in decision-making within the family. As described above, of the 371 responses to the MIA survey, 196 (52.8%) were filled out by women and 175 (47.2%) were completed by men.

In the *Pa Enua*, and to a greater extent on Rarotonga, traditional gender roles are changing. As an example, the food supply chain is more intermittent in the *Pa Enua* than on Rarotonga and the result of this is a greater reliance on producing their own food. Fishing, hunting and planting have traditionally been men's roles; while housekeeping and child-raising were part of women's roles. With the changes though, these gender roles are becoming much more mixed.

IMPLEMENTATION CONSIDERATIONS

¹ MIA, 2024, pg 6. *Cook Islands Country Report for Women*, Ministry of Internal Affairs, Rarotonga, Cook Islands.

² Ibid, pg 22.

The gender assessment raised some potential issues that have been taken into consideration in the design and implementation of the project. These are:

- Ensuring that there are no gender-based constraints on participating in the project.
- Supporting specific out-reach to encourage women to participate at all levels within the implementation process, including the building work-teams.
- Implementing gender-responsive awareness campaigns to promote participation in awareness raising workshops and funding application support services.
- Ensuring decision-making criteria are gender blind and allocate funding resources fairly based on identified resilience needs.
- Monitoring of the project has gender specific indicators.
- Gender responsive results framework and indicators
- Knowledge flows and sharing include all genders.
- Public communications during implementation are open and broad reaching.

These are discussed in more detail in Annex Four including where the monitoring responsibilities will lie.

GENDER ASSESSMENT AND ACTION PLAN

IMPACT STATEMENT

Improving the livelihoods of families in the *Pa Enua* by ensuring that there is an equal opportunity and treatment for women and men to participate in and benefit from the implementation of the DCCI project.

The overall goal of the DCCI project is to increase the resilience of disadvantaged communities in the Cook Islands. This project will contribute to the goal by building the capacity for climate change decision-making in the *Pa Enua*, devolving the consideration of applications and allocation of funding, and supporting local resources to implement the project.

OUTCOME STATEMENT

An estimated 430 disadvantaged families with 741 women and 786 men, living in the *Pa Enua* have their homes improved to be more resilient to the impacts of climate change.

GENDER ASSESSMENT

Designing a project to be implemented in isolated island communities means recognizing the existing socio-cultural norms, especially how they relate to gender roles. We need to balance acknowledging those norms and the established relationships supported by those norms, with an ability to work with the whole community regardless of age, gender, ability or status during the implementation of the project.

In the Cook Islands there is no legal distinction between any gender accessing CIG services. Access to education, health, and social welfare is not restricted based on gender. Similarly, access to land resources is both matrilineal and patrilineal for men and women. There is no legal, regulatory, or customary grounds that will cause exclusion from the DCCI based on gender.

The Gender Assessment was based on:

- reviewing national policies and sector documents including the NIE gender related policies,
- reviewing Gender related lessons learned from previous AF projects implemented in the *Pa Enua*,
- stakeholder consultations during 2025 and 2026,
- discussions with the NIE and other CIG agencies,
- reviewing the Gender Assessment and GAP carried out for FP281 and in particular for implementing support for Tier One families,
- reviewing other countries' LLA projects,
- reviewing the AF Gender Policy and Guidance documents,
- CCCI personnel knowledge of gender issues for implementing projects in the *Pa Enua*.
- discussions with a women's support group.

POLICY ENVIRONMENT

Cook Islands Gender Policy

The National Policy on Gender Equality and Women's Empowerment¹ (NPG) is the guiding national document on Gender in the Cook Islands. The purpose of the policy is to provide a comprehensive framework for accelerating and enhancing gender equality and the wellbeing of women in the Cook Islands.

There are six outcomes for which strategic actions have been identified:

- Outcome 1: A Gender Responsive Government
- Outcome 2: Gender Equity in Leadership and Governance
- Outcome 3: Women engaged in Economic Development
- Outcome 4: Healthy Women and Girls
- Outcome 5: Eliminating Violence against Women

Each outcome has specific indicators to measure progress towards the outcomes.

NIE Gender Policy

The MFEM have their own Gender Policy which is based on the NPG. The MFEM Gender Policy facilitates the consideration of the different roles, needs and perceptions of women and men during the planning, implementation, and management of projects that are supported through MFEM.

The Objectives of the MFEM Gender Policy are:

- To adopt a gender sensitive approach which will achieve greater and more sustainable development results, in an efficient manner.
- To ensure that women and men equally benefit from activities which are funded through MFEM from both national resources and development partner assistances.
- To avoid or minimise potential risks and impacts on women and men from projects funded through MFEM.
- To contribute positively to removing the institutional barriers to gender equality.

Climate Change Policy

Both the Climate Change Policy and the Cook Islands Climate Change Country Programme are based on an acknowledgement that climate change impacts differentially on the various sectors of society and by gender and recognises that there is a broad spectrum of interests. The Cook Islands climate change response therefore is built on working in an inclusive and integrated manner to ensure equity in the planning, participation and outcomes of activities.

The various policies give guidance to the design and implementation of a climate change project in the *Pa Enua* and have informed the gender assessment process for this proposal.

Assessment Findings

The key findings from the Gender assessment for the implementation of the DCCI were:

- Women in the *Pa Enua* continue to experience greater gender equality issues than women in Rarotonga.
- Women living in the *Pa Enua* are more reliant on natural resources for their livelihoods

¹ MIA 2019. *National Policy on Gender Equality and Women's Empowerment and Action Plan 2019 – 2024*, Ministry of Internal Affairs, Rarotonga, Cook Islands.

- and are therefore more vulnerable to climate factors².
- One in three women has reported experiencing physical or sexual abuse from an intimate partner in their lifetime³.
 - Elderly women and returnees are particularly vulnerable to climate change because of fixed incomes, lack of physical support, and deteriorated housing conditions.
 - Low female participation in trades and construction limits women's ability to access some resilience building jobs.

Some of the lessons learned from the PEARL project were:

- Gender equality and social safeguards have to be integrated from the beginning of the project.
- Gender equality indicators must be developed prior to implementation.

GENDER RESPONSIVE IMPLEMENTATION

Involvement of Women

The stakeholder consultations that have provided guidance for the development of this proposal and informed the gender assessment have been based on shared participation. From the responses to the initial MIA survey, to the individual island meetings, and CIG agency meetings, women have participated in more numbers than men.

Women will be involved in the delivery of services. At the time of writing, the two main agencies involved in the DCCI are led by women (OPM, MIA). Of the six focal points who will be leading in the engagement on each island, four are women. There will be less women involved in the building work as this is a job sector which has low participation by women nationally, however some activities will be directed at improving women's participation.

Implementation Considerations

The gender assessment raised some potential issues that have been taken into consideration in the design and implementation of the project.

Vulnerability of Women in the Pa Enua

Families living in the Pa Enua are more vulnerable to the impacts of climate change for a number of reasons discussed in the text. Low incomes combined with higher living costs limit their ability to fund activities that will increase the resilience of their homes. On top of that, food sources and small-scale income generating activities traditionally accessed by women in the *Pa Enua* are all being affected as the natural resources are being impacted by climate change.

Physical or Sexual Abuse

There will be a zero-tolerance approach to physical or sexual abuse connected to the implementation of the DCCI. As part of the EDA, training material will be developed to be gender and SEAH inclusive, and the training sessions will also cover environmental and social safeguards and the project level GRM, to ensure safe equitable and compliant implementation. All workers will be required to sign a Code of Conduct explicitly prohibiting harassment or exploitation.

The DCCI will utilize those processes as the workers and workplace will be the same.

² Un Women, (2022), *Gender Equality Brief for The Cook Islands*, <https://asiapacific.unwomen.org/sites/default/files/2023-02/UNWOMEN-COOK-ISLANDS-FINAL-FEB-2023.pdf>

³ Ministry of Health (2014). *Te Ata o te Ngakau: The Cook Islands Family Health and Safety Study*, Ministry of Internal Affairs, Cook Islands, 2014.

As well as the normal legal avenues there will also be a Grievance Redress Mechanism established and discussions have been held with Punanga Turuturu Itivaine (PTI) which is a Women's support group based in Rarotonga. If a grievance involving GBV or SEAH is raised, PTI will provide an assessment of the complaint. If required, they can also provide emergency support on-island, counselling on-line from trained abuse councillors in Rarotonga, and can participate in awareness workshops.

Vulnerability of our Disadvantaged Communities

Making sure that we reach all of the disadvantaged families in the Pa Enua will be the first step in reducing their vulnerability. Women and Men that are elderly including elderly returnees; physically disabled; individuals with mental health issues; and those with very low incomes, are all part of the communities that the DCCI is supporting.

Participation of Women in the Construction Sector

There is an increasing number of Cook Islands women engineers, particularly in the Public Service, but this is not spreading yet into the building labour part of the construction sector. There will be specific out-reach to encourage women to participate at all levels within the implementation of the DCCI, including the renovation work-teams.

Monitoring and Evaluation

Sex-disaggregated data with gender specific indicators are included as part of the M&E plan. They will facilitate the analysis to support reporting on differences in participation and access by men and women.

Protecting the safety of everybody involved with the DCCI implementation is a prime consideration. The project monitoring will include regular evaluations of the effectiveness of measures to prevent violence or harm against women and children.

CONCLUSION

Gender considerations for the DCCI are not just in this GAP but are infused throughout the proposal and design of the project. Whether it is at the PMU level or as project staff or as an individual in the *Pa Enua*, the intention is to ensure that there are no gender-based issues or constraints on participating in the project.

If they do occur, then the processes and procedures are in place to support, manage, mitigate or resolve them. Table 6.1: Output Statements and Indicators provides some details on the activities that are part of the process.

Table 6.1
Output Statements and Indicators

<u>Outputs</u>	<u>Activities</u>	<u>Indicators</u>	<u>Targets</u>	<u>Timeline</u>	<u>Responsibilities</u>	<u>Costs USD</u>
Capacity Built of local institutions involved in DCCI.	Specific outreach to encourage women to participate in agency workshops	Number of women participating in workshops	30 women participate by project mid-term.	Begin at Inception Workshop. 30 women by year four	Executing Entity	\$10,000
		Number of women with roles in implementation of DCCI	50 women in implementation roles by project completion	50 women by year seven	Executing Entity	
Island community workshops increase participation in DCCI.	Specific outreach to encourage women to participate in community workshops	Number of women participating in workshops	150 women participate by project mid-term	Begin at planning for workshops. 150 women by year four	Executing Entity	\$5,000
		Number of women completing applications	200 women complete applications	200 women by year seven	Executing Entity	
Renovation work completed to required standard and assessed.	Project staff positions are equally accessible to men and women.	Number of Women employed	50% of staff are women by mid-term	Begin when PMU established	Executing Entity	Nil
	Ensuring decision-making criteria are gender blind and allocate funding resources based on identified resilience needs.	Eligibility criteria applied equitably in 100% of decisions.	Zero IG decisions overturned by PMU by project completion.	Begin at call for applications.	PMU/EE/NIE	Nil
	Specific outreach to encourage women to participate in renovation work	Number of women in training and upskilling programme	20 women by project mid-term 30 women by project completion	Begin at first training intake. 20 women by year four. 30 women by year seven.	PMU in coordination with EDA	\$5,000

	Implementing zero-tolerance for gender-based violence	Number of participants in training and upskilling programme Number of Code of Conduct signed	200 participants by project mid-term. 250 signed by project completion	Begin at first training intake. 200 by year four. 250 by year seven	PMU in coordination with EDA.	Nil
	Implementing a Grievance Redress Mechanism	Number of grievances filed by women	Partner with PTI to support GBV survivors and deliver counselling	Begin at Inception.	PTI, PMU	\$36,000
	Measuring increased resilience of disadvantaged women in the Pa Enua	Data of vulnerable sub-groups of women (such as elderly or disabled) living in renovated homes Total number of women living in renovated homes	Data in seven annual reports 700 women by project completion	Begin at first PPR. Seven by year 7. 700 by year seven	EE/NIE EE/NIE	Nil