



Appraisal Environmental and Social Review Summary

Appraisal Stage

(ESRS Appraisal Stage)

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BASIC INFORMATION

A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
Comoros	AFRICA EAST	P173114	
Project Name	Comoros Inter-island Connectivity Project (SOP1)		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Transport	Investment Project Financing	2/14/2022	5/23/2022
Borrower(s)	Implementing Agency(ies)		
Government of the Union of Comoros	PIU PICMC, Ministry of Maritime and Air Transport, Société Comorienne des Ports		

Proposed Development Objective

The overarching Program Objective is to improve maritime transport connectivity, climate resilience and safety between the islands.

At the project level, the Project Development Objective is to improve maritime transport connectivity and climate resilience between the islands.

Financing (in USD Million)	Amount
Total Project Cost	80.00

B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?

No

C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]

Inter-island connectivity is among the most important constraints to integrate domestic markets and reduce poverty and inequality in Comoros. The overall program aims at improving maritime connectivity among the islands and



ameliorating maritime transport resilience and safety by increasing the port capacity, installing proper infrastructure and protection at the primary and secondary ports and strengthening the regulatory and institutional framework to ensure efficient, affordable and safe inter-island transportation. The SOP1 is focused on improving maritime transport connectivity and climate resilience between the islands, by rehabilitating and expanding Port Boingoma with a particular focus on climate resilience of port infrastructure and port operations.

D. Environmental and Social Overview

D.1. Detailed project location(s) and salient physical characteristics relevant to the E&S assessment [geographic, environmental, social]

The Comoros is an archipelago of three major islands, Grand Comores, Moheli and Anjouan, situated off the coast of Mozambique in the Indian Ocean. The proposed project aims to improve maritime transport connectivity, resilience and safety between the islands to support economic integration in the Union of Comoros. The project will be implemented in all the three islands in Comoros - Fomboni area on Moheli island and secondary ports Chindini in Grande Comore, Hoani in Moheli, and Bimbini in Anjouan. These selected sites are in coastal zones with some sensitive ecosystems (coral reefs, spawning areas).

The Comoros has a population of about 830,000 with an estimated 40 percent of Comorians living below the national poverty line in 2014. Moheli is the most lagging-behind region in the country. While poverty incidence in Moroni and other parts of Grande Comore are relatively low at 30.7 percent and 32.7 percent, respectively, Moheli has the highest rate of 53.2 percent. Poverty in Anjouan is 38.2 percent. Society is matrilineal, and women have access to property according to custom and law. In reality, however, women do not always have the right to use them. The traditional system tends to exclude women from formal decision-making processes. Men hold heads of villages positions. Parliamentary seats held by women have increased to 16.6 percent in 2020 (from 6 percent in the previous term), but women hold only 4 seats. The active labor force is mainly employed in agriculture and services. About 38 percent of the working-age adults have their main job in agriculture and 29 percent are employed in the service sector, while employment in industry or manufacturing and trade is relatively low. Less-educated workers are generally concentrated in agricultural employment, and to a lesser extent trade, while those with superior education are engaged in the service sector. The participation in the labor market and the nature of employment is characterized by some gender discrepancies. Only one-third of women are part of the workforce, compared to a participation rate of 57 percent for men. The Bank's CPF notes that fisheries accounts for 24 percent of the agricultural GDP of Comoros (or 7.5 of total GDP) and employs directly and indirectly an estimated 8,500 people or 4.2 percent of the labor force, thus providing an important source of livelihood for poor families. Fishing is mainly artisanal and many fishers still use traditional wooden canoes. However, small motorized fiberglass boats have been introduced into artisanal fishing. While Grande Comore and Anjouan are relatively well connected, Moheli, the poorest island, is most isolated. Local travelers mainly use small "informal" boats among beaches ("secondary ports") to meet the daily transport needs as formal maritime transport sector has been shrinking. Local people rely on efficient but unsafe small boats (i.e., kwassa kwassa) for their daily transportation between the islands. Kwassa kwassa is not designed for passenger services but a type of fast fishing boat, 6 to 10 meters long and about 1 to 2 meters wide, flat-bottomed and equipped with one or two engines. For safety reasons, the Government prohibits passenger operations by kwassa kwassa. However, the policy is not strongly enforced because there is no alternative transport means to meet the time-elastic needs for local communities. It is estimated that, about 136,000 passengers cross the Indian Ocean per year by kwassa kwassa. The safety records



received from the National Agency of Maritime Affairs (ANAM) show that on average 4-7 incidents involving kwassa kwassa was recorded annually.

D. 2. Borrower’s Institutional Capacity

The Project will be managed by a project implementation unit (PIU) created under the Ministry of Maritime and Air Transport (Ministère des Transports Maritime et Aérien, Chargé du Tourisme et de l’Artisanat), which is responsible for implementing all maritime transport policies in Comoros, including port regulations and PPP supervision. Relevant technical staff on Social, Environmental and GBV risk management have been recruited by the PIU to oversee the implementation of risk management aspects. The implementation of ESIA for Fomboni port and the Environmental and Social Management Framework (ESMF) for vessels renewal and secondary ports’ construction will also require staff that the Contractors must hire to ensure compliance with social (including GBV) and environmental risk management aspects. As recommended under the ESIA for Fomboni, Ministry of Transport will implement an Environmental and Social Management System (ESMS) for operation of the Fomboni Port which includes measures for managing risks and impacts related to the operational phase. Further, technical support requirements have also been identified for the operational phase. The PIU will work closely with the SCP (Société Comorienne des Ports) for ports technical operation, the ANAM (Association Nationale des Affaires Maritimes) as the organization in charge of administrative actions related to hydrographic activities and other key actors involved in project preparation and implementation such as the Ministry of Environment, the RENAP (Réseau National des Aires Protégées). These entities are not yet familiar with the WB’s operations or with the ESF. The ESMF and ESIA for Fomboni have identified the relevant E&S capacity building described in the ESCP. The Bank will provide technical oversight through regular missions.

II. SUMMARY OF ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC)

High

Environmental Risk Rating

High

The environment risk is assessed "High". Based on the ESIA for Fomboni port and ESMF, the potential adverse risks and impacts of the improvement of the existing Fomboni Port infrastructure in Moheli island and secondary Ports in the three islands include perturbation of marine habitat and potential damage to marine biotopes during dredging; port waste and pollution control, pollution from the dredged material; occupational and community health & safety issues and potential increase in road or traffic-related accidents especially during construction and transportation of dredged material. In fact, the infrastructure improvement in the Fomboni port will likely involve heavy civil works, with noise, vibration, dust, traffic, and possible community safety concerns. Although only limited amounts of dredging are required and the fact that the dredging material is not contaminated as per laboratory analysis, the improper management of such material can cause turbidity, affecting the marine habitat. The biological inventory of the port area did not identify the existence of sensitive species in the IUCN red list or coral beds, but the port site is in the protected area of Moheli. During the operation of the port and improved landing sites, environmental risks may include storm-water runoff, handling or storage of hazardous cargo and its movement through populated areas, health, safety and security issues in the Port areas. Limited country capacity is a contributing factor to support a high rating for environmental risks. Project activities on the Vessel Renewal Program are expected to have adverse environmental impacts related to scrapping of old vessels and subsidies for the acquisition of new vessels. Risks and

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impacts related to the decommissioning of old vessels will be further investigated during project preparation , but are likely to include occupational health and safety, management of hazardous materials and management of non-hazardous and hazardous wastes. Subsidies for the acquisition of new vessels include risks and impacts related to the operation of those vessels, including the health and safety of the crew and passengers, as well as the management of hazardous materials and marine pollution. To manage these risks and impacts, the borrower has developed an ESIA for Fomboni port and ESMF for the construction of the secondary ports and Vessel Renewal Program. Borrower capacity and commitment: A Social Specialist, an Environmental Specialist and a SEA/GBV/SH Specialist have been recruited by the project to oversee the implementation of risk management aspects. Capacity building assessment will be conducted continuously for the PIU and all port sector stakeholders to ensure the implementation of environmental and social measures and the monitoring of the activities themselves. The PIU will cooperate closely with the SCP (Société Comorienne des Ports) for ports technical operation, the ANAM (Association Nationale des Affaires Maritimes) as the organization in charge of administrative actions related to hydrographic activities and other key actors involved in project preparation and implementation such as the Ministry of Environment, the RENAP (Réseau National des Aires Protégées).

Social Risk Rating

Substantial

The Social Risk is assessed as “substantial”. Project impacts are mainly small scale and can be mitigated. Component 1 is focused on infrastructure building and port improvements. The Resettlement Policy Framework (RPF), ESIA and ESMF prepared for the project indicate that there is little, if any, land taking involved in the port areas. The areas occupied by ports belong to the Government which will be verified and confirmed during screening for ESMPs. This will also provide information on land use and existing claims, if any. If required, a Resettlement Action Plan will be prepared for each port. However, construction will require land for borrow pits and access roads. This will require the preparation of Resettlement Action Plans guided by the Resettlement Policy Framework prepared for the project. Economic impacts may also take place as crop losses and other livelihood losses are expected. These would require the preparation of RAPs/Compensation Plans or Livelihood Restoration Plans (LRP) where required. Sub Component 2.2 focuses on interventions related to vessel renewal program for kwassa kwassa operators. A preliminary social assessment of kwassa kwassa owners under the ESMF indicates that livelihood losses could be faced depending on the number of boats phased out and the availability of funds for their replacement. The vessel renewal program will need to assess livelihood impacts and prepare implement measures to mitigate any livelihood impacts on operators who do not benefit from the Vessel Renewal Program. Component 1 will use labor for construction activities. While most labor is expected to be drawn from local areas, there will be some influx of labor for civil works. Further, the risk of poor working conditions that are not line with ESS 2 and Comorean labor laws also requires mitigation measures. Risks related to labor also include use of child labor, forced/bonded labor and discrimination is employment unless specific measures are in place to check these practices. Another risk under Component 1 is related to community health and safety during infrastructure construction through increased traffic, movement of machinery and materials etc. This can lead to impacts on health through emissions, increased noise and road accidents. The ESMF and ESIA include guidance on traffic management and managing the spread of infectious diseases including COVID-19. The risk of GBV/SEA/SH is assessed as moderate mainly as a result of labor influx. The risk of conflicts with communities and lack of awareness about the project will also need to be addressed as this can create resentment among local residents. Illiterate, poor, disabled and marginalized groups (e.g women) can be left out of consultations unless consultations are specifically designed to include such groups. The Stakeholder Engagement Plan includes an assessment of stakeholders according to their influence and impact and outlines measures for consulting them during the various stages of implementation. During the preparation stage,

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consultations were undertaken with a range of stakeholders including women, fishermen, local residents. Such consultations will continue to take place during implementation.

Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) Risk Rating

Substantial

The SEA/SH risk is assessed as substantial which is mainly linked to labor influx and large civil works. Noncommercial, non-marital sexual relationships motivated by the implicit assumption that sex will be exchanged for material support or other benefits mainly for vulnerable groups should be considered as a risk. In particular, labor influx can create situations that contribute an increased risk in SEA/SH. The project's SEA/SH Risk Assessment has identified a number of measures to put in place to ensure that SEA/SH risk is mitigated and that there are protocols in place in case such cases take place.

B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:

ESS1 is assessed as relevant. The Project is likely to generate a wide range of significant adverse risks and impacts on human populations or the environment because of the complex nature of the Project. The Project is likely to have long term, permanent and irreversible impacts due to the nature of its activities.

Following the project design and social and environmental profile on the grounds, the potential risks and impacts are related to the following: (1) weak capacity (human and resources) of the client/project implementation unit to assess and manage environmental and social risks and impacts; (2) land acquisition and resettlement due to temporary physical and economic displacement of persons, vendors and businesses and lost of fisherman livelihoods during construction , (3) poor labor and working conditions and risks related to occupational health and safety due to the size of the civil works; (4) Environmental damage due to improper management of excess material and organic waste from dredging, (5) Community health and safety such as risks related to Gender Based Violence (GBV) and Sexual Exploitation and Abuse (SEA) and spread of infectious diseases, accidents and road safety during construction phase, (6) potential labor influx into the project area during construction owing to opportunistic settlements and migrant workers seeking employment, (7) pollution from the dredged material; (8) possible impact on cultural heritage mainly on tangible but possibly also intangible sites, (9) perturbation of marine habitat and potential damage to marine biotopes during the dredging, and (10) management of construction and hazardous wastes. Other environmental and social risks include elite capture in the Vessel Renewal Program subsidies unless this process is managed in a transparent and equitable manner.

In addition, risks and impacts related to the Vessel Renewal Program are anticipated related to the decommissioning of old vessels and the operation of new vessels. Vessel licensing requirements to meet relevant requirements under national law and obligations under international law will be investigated during preparation for both freight vessels and small passenger boats to be supported with subsidies under the Vessel Renewal Program. Comoros is a signatory to International Maritime Organization (IMO) conventions and where relevant, all vessels will be expected to be operated consistent with IMO Safety of Life at Sea Convention (SOLAS) and International Convention for the Prevention of Pollution from Ships (MARPOL).

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A standalone ESIA/ESMP for the port of Boingome (Fomboni) and an ESMF for the construction of secondary ports and vessels renewal were prepared prior to appraisal and will be captured in Contractor Environmental and Social Management Plan (C-ESMP) during the construction phases and operational ESMPs. The ESIA for Boingoma (Fombini) defines mitigation measures for construction and operational phases, roles and responsibilities, time plans, costs and implementation procedures for each mitigation measure recommended. The ESIA also provides preliminary assessment and guidance on managing community health and safety risks related to GBV and COVID-19, management of labor and GRM. Before the construction operations, the contractor will prepare additional instruments for the construction phase the C-ESCP and the environmental and social management plan for the selected quarry sites, submit for approval and ensure that staff is in place to oversee implementation of social and environmental risk mitigation measures. The project susceptibility to Climate change related hazards, such as sea level rise, erosion, flooding has been assessed and the port rehabilitation design and civil works have considered specific measures to manage and reduce the risks to include in the C-ESMP and ESMS for port Authority.

The ESMF for secondary ports also includes Labor Management Procedures and a SEA/GBV/SH Risk Assessment and Action Plan. The ESMF recommends to develop standalone ESIA for each secondary port in parallel to technical studies. Prior to the commencement of civil works, each port to be rehabilitated under Components 1 will develop and implement a Resettlement Action Plan (RAP) in line with the Resettlement Policy Framework (RPF) prepared at appraisal. Construction Contractors will be required, as a condition of their contracts, to implement and comply with the C-ESMP, that will include include all necessary specific management plans and procedures provided in the ESIA/ESMF.

The ESIA for the port of Boingoma, Fombini (subcomponent 1.1), the ESMF for the secondary ports (subcomponent 1.2), and vessels renewal (subcomponent 2.2) and the RPF covering the above mentioned ports were prepared by the Borrower. The ESIA for Fthe port of Boingoma, Fomboni and the ESMF for the secondary port and vessels renewal program have been disclosed in the country on January 18, 2022 and to External WB website on January 20, 2022. the remining ESF instruments (RPF-LMP-SEP, including GRM-ESCP) were consulted and will be disclosed before appraisal both in country and on the Bank’s website too. For Subcomponent 2.2, Vessel Improvement Program, the ESMF assessed the issues and constraints faced by kwassa kwassa boat operators and recommendations were made on addressing any livelihood impacts due to the subsidy program. A detailed assessment in the E&S studies during implementation will identify if a Livelihood Restoration Plan (LRP) will need to be prepared and implemented to ensure that and livelihood impacts faced by operators that do not benefit from the Program are mitigated. The ESMF also recommends how to ensure transparency, outreach and communication and handle any complaints in the process.

Prior to the operation phase, Ministry of Transport will be expected to develop and implement an ESMS for the operation of the Boingoma (Fombini) Port and the three secondary Ports. This ESMS will include measures for managing risks and impacts related to the operational phase consistent with ISO 14001 and ISO 45001 standards, and a GRM for all stakeholders during the operation phase.

A pre-feasibility study was conducted during preparation to explore possible public-private partnership (PPP) structuring option for Port Boingoma capex and O&M. The study indicates that the potential private sector contribution to capital investment may be limited due to the small size of Port Boingoma (Fombini), though a certain type of collaboration with private sector partners could be introduced for port operations, which is why the project is proposed to be prepared applying the ESF at this time.



A CERC-ESMF will be prepared while carrying the technical studies, in case the CERC is activated, to screen and propose mitigation measures related to implementing emergency activities in case the CERC component is activated.

ESS10 Stakeholder Engagement and Information Disclosure

ESS 10 is assessed as relevant. A Stakeholder Engagement Plan (SEP) will be developed, which will guide the consultation processes and stakeholder engagement throughout the life cycle of the project, starting from preparation down to implementation. During the ESIA exercise, stakeholder mapping will be conducted which will identify stakeholders in the different project intervening zones. Potential stakeholders are Ministry of Transport, boat operators, commercial users of Fomboni port, coastal communities, travelers and service providers for travelers and port operations. Stakeholder mapping will also analyze the influence of these stakeholders to the project design and implementation and the project's impacts on them. Special attention will be given to inclusion of women, vulnerable and project affected people, as well as other interested groups. Based on stakeholder mapping, the Borrower will prepare Stakeholder Engagement Plan (SEP) which will include a detailed schedule of planned engagement activities for the various stakeholders during the project cycle and will specify format and frequency of these engagement. The SEP will ensure all consultations are inclusive and accessible. It will include a Grievance Redress Mechanism. Labor Management Plans will also outline a labor GRM for implementation. The draft of SEP will be prepared and disclosed as early as possible but prior to the project appraisal.

B.2. Specific Risks and Impacts

A brief description of the potential environmental and social risks and impacts relevant to the Project.

ESS2 Labor and Working Conditions

ESS2 is assessed as relevant. The proposed project will involve direct workers, contracted workers and primary supply workers. Labor/contracted workers during construction are expected to be employed by the project. In Comoros where overseas migration to find work is rampant, labor requirements are often supplied from outside the project areas.

Labor Management Procedures (LMPs) have been outlined in the ESIA. The Project Implementation Unit (PIU) will include 17 workers which will include contracted and direct workers. Other contract workers will include 95 workers at Chindini and Hoani ports, 50 workers at Vassey port and 125 at Fomboni port. Hence a total of approximately 270 direct and contract workers are expected to be employed by the project. The PIU is also expected to contract consultants for any specialist studies. No community workers will be employed by the project. The project will also use primary supply workers. These will be employed by parties expected to provide material to the project such as construction material, suppliers of trucks for port construction sites and other services etc.

LMP includes an assessment of labor related risks for direct and contract workers such as those related to working conditions, Health and Safety, inequality and discrimination and provides guidance on their mitigation. These risks include inadequate and inappropriate working conditions for workers which are not aligned with local legislation and ESS2, discrimination, inequality of opportunity, violence (particularly SEA/GBV/SH), child and forced labor, inappropriate health and safety conditions and denial of right for workers to organize.



The PMU will be responsible for the overseeing measures related to labor management and working conditions. The PMU will hire one or more staff directly responsible to undertake the overall implementation of the Project in compliance with the provisions on labor and working conditions; ensure that contractors prepare their work management procedures which comply with the LMP and the Contractor's ESMP before the work commences, ensure that contractors/ sub-contractors respect their obligations towards contract workers, ensure that the potential risks of child labor, forced labor and serious safety concerns for primary supply workers are addressed, monitor the training of workers affected by the project; ensure that the complaints mechanism for project workers and PIU is established and implemented and that procedures are in place for workers to sign the Code of Conduct for Workers and any other measures aimed at addressing the risks of sexual exploitation and abuse (EAS) / sexual harassment (HS). The Supervision Engineer will also employ staff to monitor the implementation of labor related measures on behalf of the PIU. Construction companies will be responsible for appointing specialists to manage labor, occupational health and safety issues. They will include measures related to health and safety and labor in their Construction ESMPs which will be approved before civil works. Contractors will also oversee the adherence of their subcontractors to the LMP, maintain records of recruitment and employment of contract workers (including subcontractors) with age verification to avoid child labor, provide induction and regular training to contract workers on environmental, social, occupational health and safety issues, require primary suppliers to identify and address the risks of child labor, forced labor, and serious safety concerns, as well as the risks of equity and discrimination. Contractors will also develop and implement a Grievance Redress Mechanism (GRM) for contract workers, ensure that all contractor and subcontractor workers understand and sign the Code of Conduct before work begins and take all other measures to deal with the risks of sexual exploitation and abuse (SEA) / sexual harassment (SH).

To ensure Health and Safety (H&S) of workers during the construction and operational phases of the project, the project will require contractors to prepare and implement their Occupational Health & Safety Plan (OHSP) following the World Bank Group Environment, Health and Safety (EHS) Guidelines (for construction activities) and Industry Sector Guidelines for Construction Materials Extraction. The OHSP will also include procedures on incident investigation and reporting, recording and reporting of non-conformance, emergency preparedness and response procedures and on-going worker training/awareness. A SEA/SH Action Plan will also be in place to mitigate and manage work place SEA/SH risks.

ESS3 Resource Efficiency and Pollution Prevention and Management

ESS3 is assessed as relevant. Dredging and rehabilitation of Boingoma Port and the three secondary Ports in the Islands could generate pollution from the construction materials, disturb the marine habitat and cause potential damage to marine ecosystem. Analysis conducted as part of the ESIA prepared for Fomboni Port, concluded that the material subject to dredging is not contaminated with heavy metals and hazardous substances. Disposal options for the dredged material were identified and evaluated in accordance with ESS3. It was retained for the port civil works design that the dock is used for storage of the dredging and de-rocking materials. A Dredging Management Plan has been prepared to minimize the impacts on the water quality and marine habitats.

Construction of temporary worker camps for the construction/rehabilitation of ports are also activities expected to generate pollution. The implementation of mitigation measures such management plans for construction materials



will be applied to reduce and minimize the impact of contamination and pollution to marine and terrestrial areas during construction, and residual impacts are expected to be limited in scope and duration.

During construction phase, air emissions will include exhaust from heavy vehicles and machinery, and fugitive dust generated by construction activities. Those most likely to be affected are workers on site and people living within the proximity of the construction sites. The implementation of mitigation measures such as dust suppression and vehicle maintenance will be applied to minimize the impact of air emissions during construction, and residual impacts are expected to be limited in scope and duration.

Construction activities will generate solid and liquid waste which will primarily include excavated soil and hazardous waste such as hydrocarbon oils from construction machinery and vehicles. The waste generated by the construction works will largely be disposed of at approved sites according with the national laws and regulations. During the operation of the port and improved landing sites, environmental risks may include storm-water runoff and handling or storage of hazardous cargo. Specific Waste Management Plans shall be developed for Fomboni port and the secondary ports, respectively in the C-ESMP before launching civil works.

The site-specific ESIA/ESMPs for Fomboni Port and each secondary Port will manage risks relevant to this standard during preparation, construction, and Project susceptibility to Climate change related hazards, such as sea level rise, erosion, flooding have been assessed. The port rehabilitation design and civil works have considered specific measures to manage climate hazard risks. The ESMS should develop natural risk preparedness plan before port operation phase.

During construction, the greenhouse gas emissions generated by the project are expected to be not substantial given the rehabilitation nature of the works. During operation, the proposed project is expected to contribute to the reduction of greenhouse gas emissions through the reduction of vessel fuel consumption intensity, resulting from the improved operational capacity of Fomboni port, which will allow a wider range of ships and better utilization, reducing emissions per unit of freight-carriage, the more efficient cargo transportation among the islands due to the adoption of larger vessels, and the replacement of kwassa kwassa by with newer and more fuel-efficient vessels. The site-specific ESIA/ESMPs for Boingoma Port and each secondary Port should manage risks relevant to this standard during preparation, construction, and operational phases.

ESS4 Community Health and Safety

ESS4 is assessed as relevant. During the construction phase, project activities have the potential to expose communities to health and safety risks especially in those communities that are situated immediately close to the Port construction activities. Communities could also be affected by the potential labor influx and SEA/GBV/SH. The Borrower has assessed SEA/GBV/SH risks through the preparation of a SEA/GBV/SH Risk Assessment and Action Plan. Influx of workers is the main underlying factor contributing to the risk of SEA/GBV/SH in the project. SEA/GBV/SH risks can be increased mainly due to (i) the influx of workers some of who may be far from their families; (ii) increasing the disposable income of workers which can increase the incidence of prostitution (iii) the proximity of the sites to establishments such as schools, markets or other places frequented by women and girls. The Risk Assessment identifies mitigation measures to address this risk including creating awareness on SEA/GBV/SH, instituting a GBV sensitive GRM which is widely disseminated, inclusion of SEA/GBV/SH requirements in tender documents, ensuring that Contractors meet their obligation to establish an Action Plan for the prevention of SEA/GBV/SH, including an Accountability and Intervention Framework, and integrate it in the ESMP, development and signing of a Code of Conduct on SEA/GBV/SH for all workers and ensuring that GBV specialists are recruited at PIU, Supervision Engineer and Contractor level.



Transportation of dredging materials and vehicle traffics during the civil works will expose communities to health and safety risks from increased traffic during construction. Access to marine transport will also be impacted and measures will need to be in place to minimize health and safety risks where passenger access sites are re-located during construction. Guidance on managing risks related to traffic has been provided in ESIA and ESMF. The ESIA also includes detailed guidance on management of risks related to marine accidents during the operational phase. The ESIA for Fomboni port is composed of an existing safety and security zones. For the secondary port, the ESIA will include a social assessment to analyze the impacts on coastal livelihoods and recommend proper measures to keep the ecosystem providing regulating services or significant provisioning to local communities. These recommendations will be incorporated into ESMPs and implemented as Coastal Livelihood Restoration Plans. For all the construction work, site-specific ESMPs will require contractors to install a safety system around the project sites (fences and safety guards) during the entire construction period. When civil works take place, equipment and vehicles will be brought together to one single well-secured area during the night to ensure both community and worker's safety. A Community Health & Safety Plan will be required from contractors, which will also include procedures on incident investigation and reporting, recording and reporting of non-conformance, emergency preparedness and response procedures and community awareness raising activities. During the operation phase, measures to ensure the health and safety of passengers will be included in the ESMS to be developed for the Ministry of Transport. This will provide guidance on managing boat and passenger safety. The C-ESMP shall conduct a Risk Hazard Assessment (RHA) for the activities during the civil works that have the potential to generate emergency event. Based on the results of the RHA, the enterprise shall prepare an Emergency Response Plan (ERP) part of C-ESMP in coordination with the relevant local authorities and the affected communities. For the operation phase of Fomboni Port, the borrower shall conduct a Risk Hazard Assessment (RHA) for the activities during the port exploitation that have the potential to generate emergency event. Based on the results of the RHA, the port authority shall prepare an Emergency Response Plan (ERP) part of the ESMS in coordination with the relevant local authorities and the affected communities.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

Under Component 1, port improvement and construction is expected to require minimal, if any, land acquisition. Land occupied by ports belongs to the Government. However, screening and preparation of site-specific RAPs will provide evidence of land ownership and provide information about any existing claims and/or land use that will need to be compensated. The RAPs will also assess if there are likely to be any livelihood impacts on fishermen during the construction and operational phases of ports and identify compensation requirements. Similarly, any impacts or disruption of businesses even where land has not been fully occupied or directly occupied will be addressed.

Further, construction work will require access roads and borrow pits. In the case of Fomboni port, borrow pit sites have been assessed in the ESIA will require a RAP to be prepared. For secondary ports, crops are expected to be impacted by access roads. For Fomboni port, any labor camp sites, outside the port, must undertake site screening and, if required, prepare a RAP before being established. Smaller ports may also require the development of worker camps which will entail temporary land acquisition. Resettlement Action Plans (RAPs) will be prepared and implemented in such cases at each port site. All RAPs will address permanent and temporary land acquisition as well as economic impacts related to formal and informal use of land.



The Project has prepared a Resettlement Policy Framework which will provide guidance on managing risks related to land acquisition and resettlement. RAPs will be prepared by a consulting firm and will be implemented by a RAP Service Provider firm to be hired after Project Appraisal. A Social/Resettlement Specialist hired by the PIU will be responsible for overall guidance and supervision on resettlement.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

ESS6 is assessed as relevant. The project has the potential to cause adverse impacts on marine and terrestrial biodiversity around each Port site. The project will also disturb the marine habitat and potentially damage marine biotopes during dredging operation.

A marine biodiversity assessment has been conducted as part of the ESIA prepared for Fomboni port, which concluded that the marine ecosystem is composed of modified habitat. The risks and impacts could be reduced at acceptable level by using of dredging technologies and protective screens to limit the dispersion of resuspended particles and materials. The preparation of a biodiversity management plan (BMP) is not required. But it is necessary to develop a coral reef restoration plan in collaboration with the forestry services before launching of works.

During the exploitation phase of the port, it is recommended that ships must implement a ballast water management plan with record system and the harbor master's office must keep records of the types of waste landed on the vessels. A monitoring system of the physical and chemical quality of water should be maintained in collaboration with the regional direction of the environment, the ANAM and the National Park of Mohéli. The Port Authority will prepared the ESMS to consider the integrity/fragmentation of marine habitats due to marine works, impacts resulting from both construction activities and O&M activities, emergency events and indirect impacts such as increased access to previously inaccessible marine resources / areas should be considered and implemented with the regional direction of the environment, the ANAM and the National Park of Mohéli.

ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities

This ESS7 is not relevant as there are no communities nor peoples who meet the World Bank criteria for Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities in Comoros.

ESS8 Cultural Heritage

ESS8 is assessed as relevant. Based on preliminary information, the sites that could be potentially affected by the project do not include any cultural heritage. Guidance on "Chance Find Procedures" have been included in the ESMF and ESIA and a chance find clause will be included in works contracts requiring contractors to stop construction if cultural heritage is encountered during construction and to closely coordinate with the relevant mandated Government authority for the salvaging and restoration of such cultural heritage.

ESS9 Financial Intermediaries



ESS9 is assessed as not relevant, as there will be no Financial Intermediaries as part of the project.

B.3 Other Relevant Project Risks

N/A

Should "Other Relevant Project Risks" be disclosable?

No

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways

No

The project will not affect international waters

OP 7.60 Projects in Disputed Areas

No

The project is not located in disputed area

B.3. Reliance on Borrower’s policy, legal and institutional framework, relevant to the Project risks and impacts

Is this project being prepared for use of Borrower Framework?

No

Areas where “Use of Borrower Framework” is being considered:

The use of Borrower Framework will not be considered for this project in whole or in part.

III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE

A. Is a common approach being considered?

No

Financing Partners

A Common Approach is not anticipated to be applied at this time.

IV. WORLD BANK ES OVERSIGHT

Corporate Oversight is being provided by the Regional Environmental and Social Standards Advisor (RSA).

V. CONTACT POINTS

World Bank

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Borrower/Client/Recipient

Borrower: Government of the Union of Comoros

Implementing Agency(ies)

Implementing Agency: PIU PICMC

Implementing Agency: Ministry of Maritime and Air Transport

Implementing Agency: Société Comorienne des Ports

VI. FOR MORE INFORMATION CONTACT

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VII. APPROVAL

Task Team Leader(s):	Atsushi Iimi
Practice Manager (ENR/Social)	Africa Eshogba Olojoba Cleared on 24-Feb-2022 at 07:25:56 GMT-05:00
Safeguards Advisor ESSA	Peter Leonard (SAESSA) Concurred on 21-Feb-2022 at 00:15:43 GMT-05:00

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