**UNION OF THE COMOROS**

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**Comoros Inter-Island Connectivity Project (PICMC)**

**P173114**

**ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN**

**(ESCP)**

**March 16, 2022**

**ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN**

1. The Union of Comoros (**the Recipient**) shall implement the **Comoros Inter-Island Connectivity Project (PICMC or the Project)** through the Ministry of Maritime and Air Transport (The International Development Association (hereinafter **IDA** **or** **the Association**) has agreed to provide financing for the Project.
2. The Recipient shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Association. The ESCP is a part of the Financing Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreement.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Recipient shall carry out or cause to be carried out, including, as applicable, the timeframes of the actions and measures, institutional, staffing, training, monitoring and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, and in form and substance, and in a manner acceptable to the Association. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the Association
4. The Recipient shall be responsible for ensuring compliance with all the requirements of the ESCP, even where the implementation of certain measures and actions is conducted by the Ministry mentioned in paragraph 1 above in collaboration with the Ministry of Environment and Forestry. In addition, the Beneficiary is required to ensure coherence between the requirements of the ESCP and the activities planned in Component 3 "Implementation support and capacity building" which aims at financing technical assistance to improve the institutional framework and capacity of the Government to implement inter-island maritime policies properly, including port management.
5. The implementation of the measures and actions set out in this ESCP shall be monitored and reported to the Association by the Recipient as required by the ESCP and the conditions of the legal agreement, and the Association will monitor and assess progress and completion of the measures and concrete actions throughout implementation of the Project.
6. As agreed by the Association and the Recipient, this ESCP may be revised from time to time during the implementation of the Project, to reflect the adaptive management of changes and unforeseen circumstances or in response to assessment of Project performance conducted under the ESCP itself. In such situations, the Recipient, through the Project Implementation Unit (PIU), will agree on these changes with the Association and revise the ESCP to reflect such changes. Agreement on changes to the ESCP will be documented through an exchange of letters signed between the Association and the Recipient. The Recipient shall promptly disclose the revised ESCP. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, the Recipient shall provide additional funds, if necessary, to implement actions and measures to address such risks and impacts, which may include those related to health, safety, influx of labour, degradation of natural resources and pollution of the physical environment (soil, air, surface and underground water, noise on construction sites), disruption of free movement of people and goods, social conflicts and health and safety of the population (outbreak of diseases among the population and workers, accidents related to site activities, health risks related to poor management of shipyard waste, loss of land and resettlement, Gender-Based Violence and risks related to child and forced labour.

| **MATERIAL MEASURES AND ACTIONS** | | **TIMEFRAME** | **RESPONSIBLE ENTITY/AUTHORITY** |
| --- | --- | --- | --- |
| **MONITORING AND REPORTING** | | | | |
| A | **PERIODIC REPORTS**  Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, the preparation and implementation of environmental and social documents required under the ESCP, stakeholder engagement activities and the functioning of the Grievance Redress Mechanism(s) including those related to resettlement and cases of Sexual Exploitation and Abuse/Gender Based Violence/Sexual Health (SEA/GBV/SH),Violence Against Children (VAW/CV). | Each quarter, at the latest on the 5th of the month following the quarter in question, starting 6 month of effectiveness date and throughout the implementation of the Project and in coordination with the report on the status and results of the Project.  Compilation shall be sent to the Association no later than the 10th of January following the year in question | PIU PICMC |
| B | **INCIDENTS AND ACCIDENTS**   1. Notify the Association of all incidents or accidents, related to the Project, which have, or are likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including those related to occupational exclusion or discrimination against certain individuals or groups of individuals and any Project-related allegation of SEA/GBV/SH in relation to the Project. 2. The notification shall provide sufficient detail regarding the incident(s) or accident(s) in question, including the immediate and root causes, and shall indicate immediate measures taken or that are planned to be taken to address the incident(s) or accident(s); it shall also include information provided by any supplier/provider or oversight entity, as appropriate. Subsequently, as per the Bank’s request, prepare a report on the incident or accident and propose any measures to prevent its recurrence. 3. The Recipient shall require suppliers and service providers to notify it of accidents and incidents in accordance with this ESCP, including through a model incident or accident notification form. | 1. Notifications of incidents and accidents shall be made within 48 hours of first becoming aware of the incident or accident. 2. A detailed report on specific information, including causes, consequences, measures taken, etc., shall be submitted to the Association within a maximum of one week after first becoming aware of the incident or accident. 3. These notification and reporting requirements apply throughout project implementation. | PIU PICMC |
| C | **MONTHLY REPORTS FROM SUPPLIERS AND PROVIDERS**  In the framework of civil works contracts or other awarded on the basis of the Association’s standard procurement files, require suppliers and service providers to provide monthly monitoring/tracking reports to the PIU. These reports shall be transmitted to the Association by the Recipient, upon request. | Monthly and throughout the implementation of the Project. | PIU PICMC |
| **ESS1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS** | | | | |
| 1.1 | **ORGANIZATIONAL STRUCTURE**   1. Establish and maintain an organizational structure with qualified staff and appropriate resources to support environmental and social risk management. To this end, the PIU shall mobilize qualified environmental, social and gender/GBV/SEA/SH specialists to manage environmental and social risks, including Environmental and Social Specialists who will ensure the implementation and monitoring of measures included in the instruments. 2. Rely on the Authority of Environment and Forests (DGEF) and its island entities, NGOs, companies and engineering and control offices, and municipalities for the monitoring and evaluation of environmental and social measures. | 1. An organizational structure comprising three (3) specialists (one environmental, one social and one gender/GBV/SEA/SH) shall be established within a maximum of 90 days after the Project Effective Date. 2. The organizational structure, including the environmental, social and gender SEA/GBV/SH specialists shall be maintained throughout the implementation of the Project. | PMU PICMC |
| 1.2 | **ENVIRONMENTAL AND SOCIAL ASSESSMENT**  Adopt, disclose and implement the Environmental and Social Management Framework (ESMF) | ESMF was prepared, disclosed, consulted upon and adopted  ESMF shall be implemented throughout the duration of the Project. | PIU PICMC |
| 1.3 | **MANAGEMENT TOOLS AND INSTRUMENTS**  The Borrower shall develop, adopt, disclose and implement the following tools and instruments:   1. Action Plan for the Prevention, Mitigation and Response to gender-based violence (GBV), Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH) ; Stakeholder Engagement Plan (SEP) including the project's Grievance Redress Mechanism (GRM); Labor Management Procedures (LMP); Resettlement Policy Framework; These documents shall be prepared in parallel of technical studies and approved by the Association 2. A Final Environmental and Social Impact Assessment (ESIA) including Environmental and Social Management System for the infrastructure improvement of Port Fomboni (Boingoma), Component 1 “Infrastructure improvement of Port Fomboni “ shall be prepared and approved by the Association      1. Resettlement Action Plans (RAPs) and Livelihood Restoration Plans (LRPs) for the Component 1 “Infrastructure improvement of Port Fomboni “shall be prepared by the Project, approved by the Association and implemented by the Project      1. the C-ESCP and the environmental and social management plan for the selected quarry sites shall be approved by the Association implemented by the project . 2. The technical Assistance activities (operationalization of the Port Authority, Enhancement of Maritime Safety, implementation Support) shall be consistent with the ESSs. | 1. The final versions of the GBV Plan, SEP, RPF, and LMP has been prepared, disclosed, consulted upon and adopted. The and the ESIA for the infrastructure improvement of Port Boingoma and ESMF has been disclosed in the Country on January 8, 2022 and to WB external website on January 20, 2022.   These instruments shall be implemented throughout Project implementation.   1. Final version of the ESIA shall be approved and disclosed prior to issuing the bidding documents for procurement of Construction Contractor(s), and thereafter implemented throughout Project implementation. 2. RAPs and Livelihood Restoration Plans shall be prepared, approved and implemented prior to commencement of any physical works.   Preparation, approval and implementation of RAPs and Livelihood Restoration Plans of Port Boingoma, will be considered conditions before the physical start of works.   1. Final of the C-ESMP and ESIA for the selected quarry sites shall be approved and disclosed prior to issuing the civil works and thereafter implemented throughout Project implementation. 2. ToR for the TA activities shall be prepared by the project and approved by the Association before launching the Request of Proposal (RP) | PIU PICMC  Contractors (C-ESMP)  PIU PICMC  PIU PICMC  PIU PICMC  Contractor  PIU PICMC  PORT AUTORITY |
| 1.4 | **MANAGEMENT OF CONTRACTORS, SUPPLIERS AND SERVICE PROVIDERS**  Incorporate relevant aspects of the ESCP, including management tools and instruments referred to in Section 1.3 above, into the ESHS specifications of the tender documents issued to Contractors.  Ensure that providers comply with the EHSS specifications of their respective contracts. | During the preparation of the tender documents and before the commencement of works.  Ensure that these measures are applied during the entire period of the Project.  Before the contract is signed and the physical start of works. | PIU PICMC |
| 1.5 | **EMERGENCY RESPONSE COMPONENT (CERC)**  a) Ensure that the [insert name of CERC Manual as specified the legal agreement] includes a description of the ESHS assessment and management arrangements [including, if applicable, insert name of any CERC-ESMF/ESMF Addendum that will be included or referred to in the CERC Manual] for the implementation of [name of CERC component, e.g., CERC Part], in accordance with the ESSs.  b) Adopt any environmental and social (E&S) instruments which may be required for activities under [name CERC component, e.g., CERC Part] of the Project, in accordance with the [insert name of CERC Manual and, if applicable, CERC-ESMF or CERC-ESMF Addendum] and the ESSs, and thereafter implement the measures and actions required under said E&S instruments, within the timeframes specified in said E&S instruments. | a) The adoption of the [insert name of manual and, if applicable, other instruments, as relevant] in form and substance acceptable to the [World Bank/Bank/Association] is a withdrawal condition under Section [XX] of Schedule 2 of the [name of legal agreement] for the Project.  b) Adopt any required E&S instrument and include it as part of the respective bidding process, if applicable, and in any case, before the carrying out of the relevant Project activities for which the E&S instrument is required. Implement the E&S instruments in accordance with their terms, throughout Project implementation. | PIU PICMC |
| **ESS2: LABOR AND WORKING CONDITIONS** | | | | |
| 2.1 | **LABOR MANAGEMENT PROCEDURES**  Develop and implement Labor Management Procedures (LMP) consistent with ESS2 and in a manner satisfactory to the Association.  Prepare and approve site-specific LMPs as part of the Contractors’ ESMP (C-ESMP) and based on the LMP prepared for the project. | LMP has been prepared, disclosed, consulted upon and adopted  Before the commencement of the civil works | PIU PICMC  Contractors |
| 2.2 | **PROJECT WORKER GRIEVANCE REDRESS MECHANISM (GRM)**  **Establish** and maintain GRM for any Project-related labor and employment matters (including SEA/SH), easily accessible to Project workers, in line with ESS2 and national labor laws. | Establish a PIU-based labor GRM within three (3) months of Project Effective Date  and maintain it throughout project implementation.  Establish GRM as part of the C-ESMP prior to the commencement of civil works and maintain it throughout duration of the works. | PIU PICMC  Contractors |
| 2.3 | **OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES**  Adopt OHS measures consistent with ESS2 as part of LMPs under action 2.1 of this ESCP.  Ensure Contractors develop and implement Occupational Health & Safety Plans (OHSPs) following the WBG 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. | On timeframe specified in 2.1.  Develop and approve OHSPs before the commencement of works and implement them throughout project implementation. | PIU PICMC  Contractors |
| **ESS3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT** | | | | |
| 3.1 | **WASTE AND HAZARDOUS MATERIALS MANAGEMENT**   1. Develop and implement a Non-Hazardous and Hazardous Waste Management Plan for the project. Ensure that this plan is consistent with the Recipient’s obligations under international treaties and ESS1. 2. Identify waste management procedures prior to the start of activities and ensure compliance with the agreements established between these managers and the project contractors 3. Ensure Contractors develop and implement site/specific Non-Hazardous and Hazardous Waste Management Plans. | 1. The Waste Management Plan shall be developed before the commencement of the civil works and implemented throughout the physical works period 2. Before the commencement of the physical works. 3. Before the commencement of the physical works and implemented throughout the physical works period | PIU PICMC  Contractors |
| 3.2. | **RATIONAL USE OF RESOURCES AND POLLUTION PREVENTION AND MANAGEMENT**  Ensure resource efficiency and pollution prevention and management measures are adopted and implemented by contractors working on the Project.  . | Same timetable as for the implementation of the ESMPs. | PIU PICMC |
| **ESS4: COMMUNITY HEALTH AND SAFETY** | | | | |
| 4.1 | **TRAFFIC AND ROAD SAFETY**  The contractor’s health and safety plan shall include traffic management plan. | To be developed as part of ESMPs.  To be implemented throughout the project | PIU PICMC  Contractors |
| 4.2 | **RISKS TO PUBLIC HEALTH AND SAFETY**   1. Ensure Contractors develop and implement ESIA/ESMP measures and actions to assess and manage the risks and impacts associated with the implementation of Project activities to local populations, including those related to the presence of Project workers and labor influx. 2. Before the start of the work, the contractors will have to prepare a Health and Safety Plan (HSP) with a detailed analysis of the safety risks (including the risks related the use of security forces at the construction sites). Specific safety measures such as access to site facilities will have to be addressed in these documents | 1. Measures to be included in site specific ESMPs. Implemented throughout the project 2. HSP and Security Risk Assessment to be prepared before the beginning of physical works | PIU PICMC  Contractors |
| 4.3 | **RISKS OF SEXUAL EXPLOITATION AND ABUSE, GENDER-BASED VIOLENCE, AND SEXUAL HARASSMENT DURING PROJECT IMPLEMENTATION**  Assess and manage the risks of SEA/GBV/SH related to the Project, including on children, and develop an Action Plan accordingly. Conduct a mapping of the referral services available in the area and an assessment of their level of functioning. The project will implement a specific mechanism for managing cases of gender-based violence in terms of referral and prevention | Action Plan for the Prevention, Mitigation and Response to SEA/GBV/SH has been prepared, disclosed, consulted upon and adopted  Measures to be included in site specific ESMPs. Implemented throughout the project | PIU PICMC |
| **ESS5: LAND ACQUISITION, LAND USE RESTRICTIONS AND INVOLUNTARY RELOCATION** | | | | |
| 5.1 | **RESETTLEMENT ACTION PLANS**   1. Prepare and implement a Resettlement Policy Framework (RPF) for the project consistent with ESS5 and in a manner satisfactory to the Association. 2. Prepare Resettlement Action Plans (RAPs), in accordance with the requirements of ESS 5 and national legislation for Biongoma. 3. Prepare a Livelihood Restauration Plan (as required) for kwassa kwassa operators. | 1. RPF has been prepared, disclosed, consulted upon and adopted. 2. The final version of each RAP shall be submitted to the Association for review and approval and shall be disclosed at the country level and on the WB website. RAPs shall be implemented before the start of civil works. | PIU PICMC |
| **ESS6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES** | | | | |
| 6.1 | **RISKS AND IMPACTS ON BIODIVERSITY**   1. Implement biodiversity management measures, in line with the ESIAs guidelines of Component 1 “Infrastructure improvement of Port Fomboni “”. These E&S measures shall be consistent with ESS6 and the obligations of the Recipient under relevant international treaties and agreements. 2. Develop and implement a coral reef restoration plan in collaboration with the forestry services before launching of works. | 1. Application of measures throughout the implementation of components 1.1 2. Prior to the commencement of any physical works of Component 1 “Infrastructure improvement of Port Fomboni “”. | PIU PICMC |
| **ESS7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES** | | | | |
|  | Not relevant |  |  |
| **ESS8: CULTURAL HERITAGE** | | | | |
| 8.1 | **CHANCE FINDS**   1. Consistent with ESS8 and to the satisfaction of the Association, prepare, adopt and implement the incidental finding procedure described in the ESMP of Component 1 “Infrastructure improvement of Port Fomboni “ 2. Ensure that future specific E&S studies include an assessment of cultural heritage sites in the area of influence of the sub-projects 3. Include the incidental finding procedure of cultural heritage in company contracts | 1. ESIA and ESMP of component 1 has been prepared, disclosed, consulted upon and adopted 2. During preparation and prior to implementation of sub-projects 3. During preparation of the bidding documents for procurement of Construction Contractor(s) | PIU PICMC |

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| **ESS9: FINANCIAL INTERMEDIARIES** | | | |
|  | Not relevant |  |  |
| **ESS10: STAKEHOLDER MOBILIZATION AND INFORMATION** | | | |
| 10.1 | **PREPARATION AND IMPLEMENTATION OF THE STAKEHOLDER ENGAGEMENT PLAN** Prepare, adopt and disseminate a Stakeholder Engagement Plan (SEP).  Implement the SMP  Update and reissue the SMP as required. | SEP has been prepared, disclosed, consulted upon and adopted Implemented the SEP throughout the Project Implementation | PIU PICMC |
| 10.2 | **GRIEVANCE REDRESS MECHANISM AT THE PROJECT LEVEL**  Implement a Grievance Redress Mechanism for the entire project, as described in the SEP. This mechanism shall be structured to report SEA/GBV/SH related complaints in a timely (within 72 hours) in a confidential, ethical, non-discriminatory and survivor-centered manner. | GRM to be operationalized no later than three months after the Project Effective Date and thereafter maintained throughout Project implementation. | PIU PICMC |
| **CAPACITY BUILDING (TRAINING)** | | | |
|  | **Type of training to be offered** | **Schedule of training sessions** | **Target groups** |
| **RC1** | **TRAINING ON ENVIRONMENTAL AND SOCIAL STANDARDS APPLICABLE TO THE PROJECT**   * NES No. 1: Environmental and Social Assessment, * NES No. 2: Working and employment conditions, * NES No. 3: Rational use of resources and pollution prevention   and management   * NES No. 4: Population Health and Safety * NES No. 5: Land acquisition, land use restrictions and   involuntary resettlement   * NES No. 6: Preservation of biodiversity and sustainable   management of natural biological resources   * NES No. 8: Cultural Heritage * NES No. 10: Stakeholder engagement and information. | Commencement of the project for the PIU staff  Six (6) months after the Project begins implementation for other stakeholders | PIU PICMC  Island entities of PICMC  Involved Sate´s Technical services involved  DGEF and its island entities  ANAM  Contractor and Supervision (ESS2, ESS4 and ESS8) |
| **RC2** | **TRAINING ON HEALTH AND SAFETY AT WORK**  Training of Project workers in occupational health and safety, including emergency prevention, preparedness and response.  Health and safety rules Solid and liquid waste management Public safety and security | Before the commencement of the civil works | PIU PICMC  Island entities of PICMC  Suppliers/Contractors  Navigation operators  ANAM |
| **RC3** | **EMPLOYMENT AND WORKING CONDITIONS**  Conditions of employment under national labour legislation  Codes of conduct for suppliers, service providers and subcontractors  Workers' organizations and trade unions  Rules on child labour and the minimum age of admission to employment for children. | Before commencement of sub-projects ‘works | Contractors  Navigation operators  ANAM |
| **RC4** | **SEA/GBV/SH**  Procedures for recording and handling complaints, archiving  Complaint Resolution Procedures  Documentation and complaint handling  Use of procedure by the different partners  Raising public awareness  SEA/SH awareness, prevention and mitigation measures | Six (6) months after commencement of the Project. | PIU PICMC  Island entities of PICMC  Suppliers/Contractors  Communities close to intervention sites  Navigation operators |