**UNION OF THE COMOROS**

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**Comoros Interisland Connectivity Project (PICMC)**

**SOP1 Additional Financing**

**P180734**

**ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN**

**(ESCP)**

**April 25, 2023**

**ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN**

1. The Union of Comoros (**the Recipient**) will implement the **Comoros Inter-Island Connectivity Project (PICMC or the Project)**, with the involvement of the Ministry of Maritime and Air Transport, as set out in the Financing Agreement. The International Development Association (hereinafter **IDA** **or** **the Association**) has agreed to provide the additional financing (AF) (P180734) under Phase 1 (SOP 1) of the Project (P173114).
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. As agreed by the Association and the Recipient, this ESCP will be revised from time to time if necessary, during the Project implementation, to reflect the adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the Recipient, through the Project Implementation Unit (PIU) and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient. The Recipient shall promptly disclose the updated ESCP.

| **MATERIAL MEASURES AND ACTIONS** | **TIMEFRAME**  | **RESPONSIBLE ENTITY/ AUTHORITY** |
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| **MONITORING AND REPORTING** |
| A | **REGULAR REPORTING**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, status of preparation and implementation of environmental and social instruments required under the ESCP, stakeholder engagement activities and functioning of the Grievance 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).GRIEVANCE MECHANISM | Quarterly reports to the Association starting 6 months after the effective date and throughout the implementation of the Project and in coordination with the report on the status and results of the Project. Submit each report to the association no later than 5 days after the end of each reporting period.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 any incident or accident, related to the Project, which has, or are likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including, inter alia, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injury [specify other examples of incidents and accidents, as appropriate for the type of operation]. Provide sufficient detail regarding the scope, severity, and possible causes of the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and/or supervising firm, as appropriate.
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.
4. Subsequently, at the Association’s request, prepare a report on the incident or accident and propose any measures to address it and prevent its recurrence.
 | 1. Notify the Association no later than 48 hours after learning of the incident or accident (24 hours in the case of SEA/SH incidents).
2. Provide subsequent report to the Association within a week to the Association on specific information, including causes, consequences, measures taken, etc.
 | PIU PICMC |
| C | **CONTRACTORS’ MONTHLY REPORTS** Require contractors and supervising firms to provide monthly monitoring reports on ESHS performance in accordance with the metrics specified in the respective bidding documents and contracts, and submit such reports to the Association, upon request. | Submit the monthly reports to the Association upon request and as annexes to the reports to be submitted under action A above. | PIU PICMC  |
| **ESS1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS** |
| 1.1 | **ORGANIZATIONAL STRUCTURE**1. Establish and maintain a Project Implementation Unit (PIU) with qualified staff and resources to support management of ESHS risks and impacts of the Project including environmental, social and gender/GBV/SEA/SH specialists.
2. Rely on cooperation with 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. Establish and maintain a PIU comprising three (3) specialists (one environmental, one social and one gender/GBV/SEA/SH): one environmental specialist and one social specialist hired and operational. One gender /GBV/SEA/SH) hired no later than two months after the effective date of the SOP1 additional financing and then maintain these positions throughout the implementation of the project.
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**1. Update, disclose and implement the Environmental and Social Management Framework (ESMF), including the GBV action plan | The SOP1 ESMF remains valid for the activities under AF. It was published on January 12, 2022. ESMF shall be implemented throughout the duration of the Project. | PIU PICMC |
| 2. Adopt and disclose an Environmental and Social Impact Assessment (ESIA) including Environmental and Social Management Plan for the infrastructure improvement of Port Boingoma, Component 1 Infrastructure improvement of Port Boingoma | The ESIA for the infrastructure improvement of Port Boingoma and ESMP was disclosed in country on January 8, 2022 and to WB external website on January 20, 2022. | PIU PICMC |
| 3. Prepare, adopt and disclose an Environmental and Social Impact Assessment with its Environmental and Social Management Plan (ESIA/ESMP) for six potential quarries for the construction of Port Boingoma Prepare, adopt and disclose of an ESIA/ESMP for the quarry of Domoni Hoani following the Geo technique study of Domoni and transport corridor  | The ESIA/ESMP for the six potential quarries was prepared, approved by the Bank and published on April 19, 2023. The TOR for the ESIA/ESMP for Domoni quarry site were approved by the Bank. The ESIA/ESMP shall be approved and disclosed prior to the launch of the works. | PIU PICMC |
| 4. Prepare, adopt and disclose the C-ESMP for the quarry of Domoni Hoani and Port Boingoma. The C-ESMP shall be submitted for approval by the Association and implemented throughout the project  | The C-ESMP shall be approved and disclosed prior to starting the civil works and thereafter implemented throughout Project implementation | PIU PICMC Contractors |
| **MANAGEMENT TOOLS AND INSTRUMENTS**The Borrower shall develop, adopt, disclose and implement the following tools and instruments:1. SOP1 AF revised 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 and approved by the Association
2. Resettlement Action Plan (RAP) and Livelihood Restoration Plan (LRP) for the Domoni Hoani Quarry, transport corridor and Port Boingoma shall be prepared by the Project, approved by the Association and implemented by the Project
3. The C-ESMP for Port Boingoma civil works the quarry site of Domoni-Hoani shall be approved by the Association implemented by the project .
4. The technical Assistance activities (operationalization of the Port Authority, Enhancement of Maritime Safety, implementation Support) shall be consistent with the ESSs.
 | 1. The SOP1 AF revised versions of the GBV Plan, SEP, RPF, and LMP were disclosed by SOP1 AF appraisal. These ESF instruments (GBV Plan, SEP, RPF, and LMP) were originally disclosed in Country on February 20, 2022 and to WB external website on February 25, 2022. The revised versions of these documents for the AF were published on April 23, 2023.
2. RAP and Livelihood Restoration Plan shall be prepared, approved and implemented prior to commencement of any physical works for Domoni quarry, transport corridor and Port Boingoma.
3. Final version of the C-ESMP for Port Boingoma civil works and the quarry site of Domoni Hoani shall be approved and disclosed prior to the start of the civil works and thereafter implemented throughout Project implementation.
4. ToR for the TA activities shall be prepared by the project and approved by the Association before launching the Request of Proposal (RP)
 | PIU PICMCPIU PICMCPIU PICMC ContractorPIU PICMC PORT AUTORITY |
|  | **MANAGEMENT OF CONTRACTORS, SUPPLIERS AND SERVICE PROVIDERS** Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&S instruments, the Labor Management Procedures, and code of conduct, into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply and cause subcontractors to comply with the ESHS 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 and throughout the project implementation. | PIU PICMC |
| 1.3 | **TECHNICAL ASSISTANCE** Ensure that the consultancies, studies (including feasibility studies, if applicable), capacity building, training, and any other technical assistance activities under the Project are carried out in accordance with terms of reference acceptable to the Association, that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.The technical Assistance activities (operationalization of the Port Authority, Enhancement of Maritime Safety, implementation Support) shall be consistent with the ESSs | 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 PORT AUTORITY |
| 1.4 | **EMERGENCY RESPONSE COMPONENT (CERC)**a) Ensure that, if applicable, the ESMF will be updated to include a CERC ESMF Addendum that will be included for the implementation of CERC component, if needed and activated, in accordance with the ESSs.b) Adopt any environmental and social (E&S) instruments which may be required for activities under the CERC, in accordance with 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 updated ESMF CERC Addendum, as relevant in form and substance acceptable to the Association is a withdrawal condition under Section III of Schedule 2 of the 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**Update and implement Labor Management Procedures (LMP) for SOP1 AF activities consistent with ESS2 and in a manner satisfactory to the Association.Prepare, approve and implement any site-specific procedures as part of the Contractors’ ESMP (C-ESMP), based on the LMP prepared for the project. | The updated LMP for SOP1 AF was disclosed on April 19, 2023.Adopt, seek approval, disclose and implement Works specific procedures compliant with project LMP before the commencement of the civil works | PIU PICMCContractors |
| 2.2 | **GRIEVANCE MECHANISM FOR PROJECT WORKERS GRIEVANCE MECHANISM** Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2 and national labor laws. | The PIU-based labor GRM established and operational 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 PICMCContractors |
| 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-compliance, emergency preparedness and response procedures and on-going worker training/awareness. | Same timeframe as specified in 2.1.Develop and approve OHSPs before the commencement of works and implement them throughout project implementation. | PIU PICMCContractors |
| **ESS3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT** |
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| 3.1 | **WASTE AND HAZARDOUS MATERIALS MANAGEMENT**1. Adopt and implement a Waste Management Plan (WMP), to manage hazardous and non-hazardous wastes, consistent with ESS3 and the Recipient’s obligations under international treaties.
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, as part of the C-ESMP, before the commencement of the civil works and implemented throughout the physical works period
2. As part of the C-ESMP.
3. Same timeframe as for the adoption and implementation of the ESMP.
 | PIU PICMCContractorsContractors |
| 3.2. |  **RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT**Incorporate resource efficiency and pollution prevention and management measures in the ESMP to be prepared under action 1.2 above. |  Same timeframe as for the adoption and implementation of the ESMP. | PIU PICMC |
| **ESS4: COMMUNITY HEALTH AND SAFETY** |
| **TRAFFIC AND ROAD SAFETY** Incorporate measures to manage traffic and road safety risks as required in the ESMP to be prepared under action 1.2 above.  | To be developed as part of ESMPs. To be implemented throughout the project | PIU PICMCContractors |
| 4.1 |  **COMMUNITY HEALTH AND SAFETY**1. Assess and manage specific risks and impacts to the community arising from Project activities, including, inter alia, any areas of risks that may require emphasis, e.g., behavior of Project workers, risks of labor influx, response to emergency situations, and include mitigation measures in the ESMPs to be prepared in accordance with the ESMF.
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. Same timeframe as for the adoption and implementation of the ESMP.
2. Same timeframe as for the adoption and implementation of the ESMP, HSP and Security Risk Assessment to be prepared before the beginning of physical works
 | PIU PICMCContractors |
| 4.2 |  **SEA AND SH RISKS**Adopt and implement a SEA/SH Action Plan, as part of the ESMP, to assess and manage the risks of SEA and SH, and consistent with the GBV Action Plan to be prepared under action 1.2 above  | Same timeframe as for the adoption and implementation of the ESMP | PIU PICMC |
| **ESS5: LAND ACQUISITION, LAND USE RESTRICTIONS AND INVOLUNTARY RELOCATION** |
| 5.1 | **RESETTLEMENT POLICY FRAMEWORK**1. RPF has been prepared, disclosed, consulted upon and adopted
2. Update and implement a Resettlement Policy Framework (RPF) for the project consistent with ESS5 and in a manner satisfactory to the Association.
 | RPF prepared for SOP1 was revised to include the additional funding activities, disclosed, and adopted bySOP1 AF on April 19, 2023. This instrument shall be implemented throughout Project implementation. | PIU PICMC |
| 5.2 | **RESETTLEMENT ACTION PLANS** Prepare and implement a Resettlement Action Plan (RAPs), in accordance with the requirements of ESS 5 and national legislation for Boingoma PortPrepare, and implement a Resettlement Action Plan (RAPs), in accordance with the requirements of ESS 5 and national legislation for the quarry site of Domoni-Hoani and transport corridor.The final version of 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.The RAPs for the quarry site of Domoni-Hoani and transport corridor shall be approved, disclosed and implemented before the start of the civil works.  | PIU PICMC |
| **ESS6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES** |
|  | **RISKS AND IMPACTS ON BIODIVERSITY**1. Adopt and Implement biodiversity management measures, in line with the ESIA guidelines of Component 1 “Infrastructure improvement of Port Boingoma”. These E&S measures shall be consistent with ESS6 and the obligations of the Recipient under relevant international treaties and agreements, as part of ESIA and C-ESMP.
2. Develop and implement a coral reef restoration plan in collaboration with the forestry services before launching of works.
 | 1. Same timeframe as ESIA and C-ESMP
2. Prior to the commencement of any physical works of Component 1 “Infrastructure improvement of Port Boingoma”.
 | PIU PICMC |
| **ESS7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES** |
|  | Not relevant |  |  |
| **ESS8: CULTURAL HERITAGE** |
|  | **CHANCE FINDS**1. Consistent with ESS8 and to the satisfaction of the Association describe and implement the chance finds procedures, as part of the ESMF and ESIA/C-ESMP of Component 1 “Infrastructure improvement of Port Boingoma “
2. Ensure that future specific E&S studies include an assessment of cultural heritage sites in the area of influence of the sub-projects
 | 1. Same timeframe as Project ESMF, ESIA and C-ESMP of component 1
2. During preparation and prior to implementation of sub-projects
 | PIU PICMC |
| **ESS9: FINANCIAL INTERMEDIARIES** |
|  | Not relevant |  |  |
| **ESS10: STAKEHOLDER MOBILIZATION AND INFORMATION** |
| 10.1 | **PREPARATION AND IMPLEMENTATION OF THE STAKEHOLDER ENGAGEMENT PLAN**Update and implement a Stakeholder Engagement Plan (SEP) for SOP1 AF consistent with ESS10, which shall include measures to, inter alia, provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation. | The revised SEP for SOP1 AF was disclosed on April 19, 2023. The revised SEP will be operational throughout Project Implementation | PIU PICMC |
| 10.2 | **PROJECT GRIEVANCE MECHANISM** Establish, publicize, maintain, and operate an accessible grievance mechanism, to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10.  The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner. | GRM operational from January 2023, will be expanded to include quarry and road transport sites prior to works commencing at those sites. Thereafter maintain and operate the mechanism 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**Training to include, but not limited to:* Preparation of Environmental and Social Assessments,
* Working and employment conditions, including OHS and emergency preparedness and response, incident response, management of contractor compliance with LMP
* Rational use of water resources water resources, and proper handling of construction waste and pollution prevention
* SEA/SH Awareness, Prevention and Response
* Resettlement planning and implementation
* Management of project-related coastal environment impacts, including on coral reefs and waters near ports
* Chance Find procedures
* Stakeholder engagement and management of GRM.
 |  Initial training for the PIU staff already provided in 2022, will continue in 2023 and beyond. | PIU PICMCIsland entities of PICMCInvolved Sate’s technical services involvedDGEF and its island entities ANAM Contractor and Supervision (ESS2, ESS4 and ESS8) |
| **RC2** | **TRAINING ON HEALTH AND SAFETY AT WORK**Training of Project workers inOccupational health and safety, including emergency prevention, preparedness and response.Health and safety rules Solid and liquid waste management Public safety and securitySEA/SH Awareness, Prevention and Response | Before the start of the civil works | PIU PICMCIsland entities of PICMCSuppliers/ContractorsNavigation operatorsANAM |
| **RC3** | **EMPLOYMENT AND WORKING CONDITIONS** Conditions of employment under national labor legislation Codes of conduct for suppliers, service providers and subcontractors Workers' organizations and trade unions Rules on child labor and the minimum age of admission to employment for children. | Before the start of sub-projects works | ContractorsNavigation operatorsANAM |
| **RC4** | **SEA/GBV/SH**Procedures for recording and handling complaints, archivingComplaint Resolution ProceduresDocumentation and complaint handlingUse of procedure by the different partnersRaising public awarenessSEA/SH awareness, prevention and mitigation measures | SEA/SH training to commence after hiring of PIU Gender/GBV specialist, and during SOP1 AF implementation and continuing throughout life of project. | PIU PICMCIsland entities of PICMCSuppliers/ContractorsCommunities close to intervention sitesNavigation operators |