



Project Information Document (PID)

Concept Stage | Date Prepared/Updated: 28-Jun-2020 | Report No: PIDC28409

**BASIC INFORMATION****A. Basic Project Data**

Country Comoros	Project ID P173114	Parent Project ID (if any)	Project Name Comoros Inter-island Connectivity Project (P173114)
Region AFRICA	Estimated Appraisal Date May 20, 2021	Estimated Board Date Jun 30, 2021	Practice Area (Lead) Transport
Financing Instrument Investment Project Financing	Borrower(s) Government of the Union of Comoros	Implementing Agency Ministry of Transportation, Post, Telecommunications, Communication and Tourism, Société Comorienne des Ports	

Proposed Development Objective(s)

The Project Development Objective is to improve maritime transport connectivity and safety between the islands to support socioeconomic integration.

PROJECT FINANCING DATA (US\$, Millions)**SUMMARY**

Total Project Cost	40.00
Total Financing	40.00
of which IBRD/IDA	40.00
Financing Gap	0.00

DETAILS**World Bank Group Financing**

International Development Association (IDA)	40.00
IDA Credit	40.00



Environmental and Social Risk Classification

High

Concept Review Decision

Track II-The review did authorize the preparation to continue

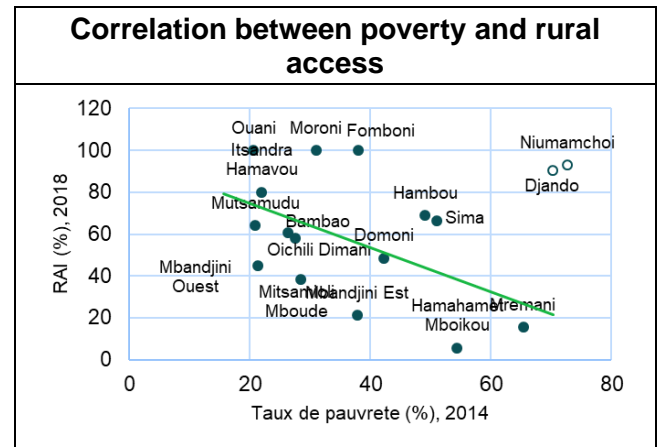
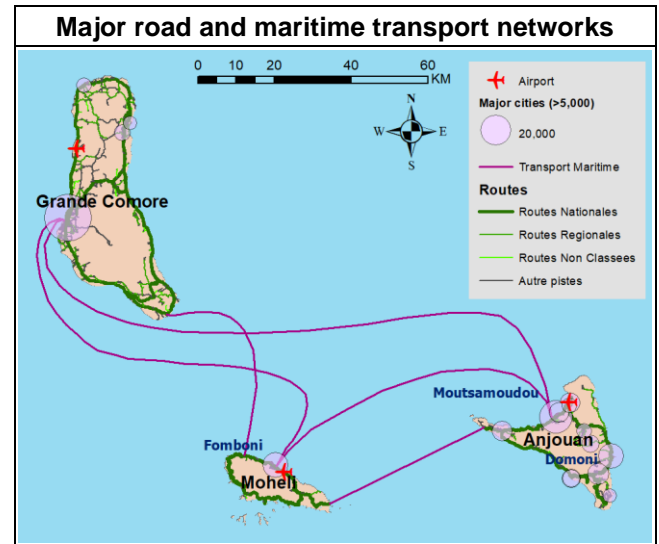
B. Introduction and Context

Country Context

1. **The Comoros is an archipelago of three major islands, Grand Comore, Moheli and Anjouan, with a total population of about 830,000**, situated off the coast of Mozambique in the Indian Ocean. Over the last decade, the country’s GDP has been growing steadily with an average growth rate of about 3 percent, reaching US\$1,440 per capita in 2018. Historically, the economy has been dependent on the agriculture sector, which employs about 60 percent of the total population, generating about 30 percent of GDP and contributing to about 80 percent of goods exports (e.g., vanilla, ylang ylang, and clove).

2. The Comorian population is predominantly young and continues growing rapidly by 2.9 percent per year, which is above the economy’s capacity to provide meaningful employment. The total population is projected to reach 1 million by 2028 and more than double by 2050. About 70 percent of the population still lives in rural areas, though Comoros is relatively highly urbanized as other small island states. Thus, sustainable job creation in both urban and rural areas is among the key development challenges. This will likely become more pressing following COVID19 with the slowdown of the global economy, which will lower commodity prices, international tourism and remittances.

3. **The Comorian economy has various untapped growth potentials, but the domestic market remains crucially fragmented because of poor transport connectivity among and within the islands.** Grand Comore with a population of 430,000 has been highly urbanized around the capital, Moroni, where service sector activities are largely concentrated. Anjouan (340,000 population) and Moheli (55,000) are rural based economies with high agricultural potential, not only for the above-mentioned export crops but also food crops, such as cassava, tomato, banana and maize, which are transported to Moroni on a daily basis. They also have potential for tourism (e.g., Nioumachoua Beach in Moheli). Unfortunately, however, such economic opportunities have not fully been exploited yet because of the lack of efficient connectivity and reliable transport services between and within the islands.





4. **Partly because of the market fragmentation, regional inequalities are persistently high in Comoros.** In 2014, about 40 percent of Comorians were estimated to live below the national poverty line, with Moheli being the most lagging-behind region. Poverty rate in Moroni was 31 percent, while Moheli had the highest rate of 53 percent. Inequality seems to have increased¹. In particular, consumption inequality measured by Gini index increased from 42 in 2004 to 45 in 2014. Not surprisingly, those who live in areas where connectivity is low tend to remain poor. There is a significant correlation between poverty incidence and transport connectivity in Comoros.
5. **Comoros is highly vulnerable to climate events**, such as tropical cyclones, rising sea levels, flooding and landslides, and other natural disasters (e.g., volcanic eruptions and earthquakes). In the last 40 years, the country was hit by 18 adverse natural events that affected close to 500,000 individuals.² More recently, tropical cyclone Kenneth alone, which hit Comoros on April 24, 2019, directly affected over 345,000 people, with 185,900 people in need of humanitarian aid. Damages and losses are estimated at US\$185.4 million with an estimated US\$277.5 million required for recovery and reconstruction. Transport connectivity deteriorated as existing infrastructure, which was already in poor condition (especially in Moheli) was damaged, including the substructure of Port Fomboni and some 90 km of primary and rural roads.
6. **Gender inequality is still an issue in Comoros.** The Comoros Systematic Country Diagnostic (SCD) recognizes that women are still underrepresented in most sectors. For example, women represent only 3 percent at national level politics despite the Constitution calling for gender equality. Male labor force participation is 51 percent, whilst female's is 37 percent.³ Other employment data shows similar disparities, for example, the share of waged and salaried workers is approximately 40 percent for men and only 17 percent for women. Data from the ILO reveals that participation rates in the transport and communications sectors are 0.5 percent and 6.5 percent for women and men, respectively. This is important as the SCD estimates that poverty is significantly lower among waged employees, and more so among those in the service, industry and trade sectors.

Sectoral and Institutional Context

B. Sectoral and Institutional Context

7. **For small island states, such as Comoros, maintaining and improving maritime transport connectivity is critical not only for trade and growth purposes but also for the nation's unification.** From the global point of view, Comoros is located at a strategic geographical position between East Africa, Madagascar and the other islands of the Indian Ocean (Seychelles, Mauritius, Reunion), and is at the heart of the main shipping route of the Indian Ocean along the African coast. Still, Comoros lags behind its neighbors in terms of global connectivity. The Liner Shipping Connectivity Index (LSCI) for Comoros has been stagnant at 6.7 (c.f., 28 for Mauritius, 12 for Mozambique and about 9 for Madagascar and Seychelles).⁴ In aviation, Comoros is also less connected to the rest of the world than Mauritius and Seychelles, which have well-developed air networks with a number of destinations, including major European hubs, such as London, Paris and Frankfurt.

¹ Haazen and Rajoela. (2016). Sub-national analysis of systematic differences in health status and the access to and funding of health services: An example from Comoros. Health, Nutrition & Population Global Practice Discussion Paper, World Bank.

² Post Kenneth Recovery and Resilience Project PAD (originally, EM-DAT: The Emergency Events Database, at www.emdat.be)

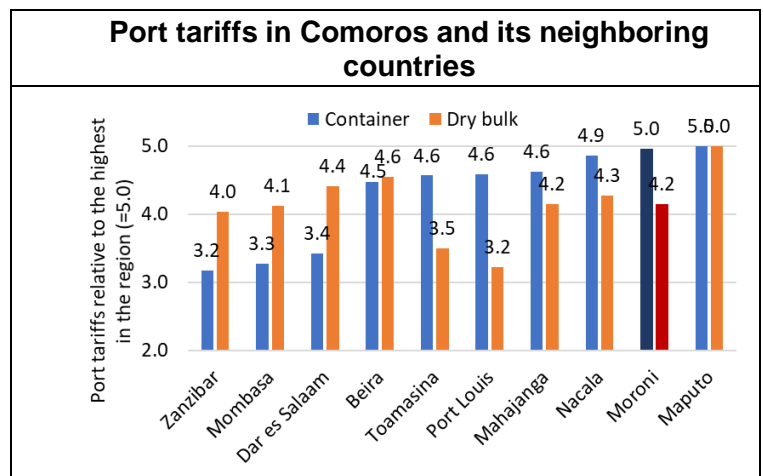
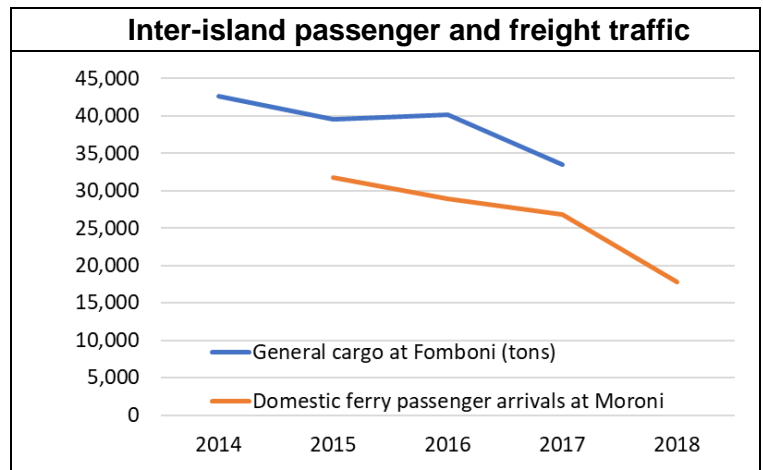
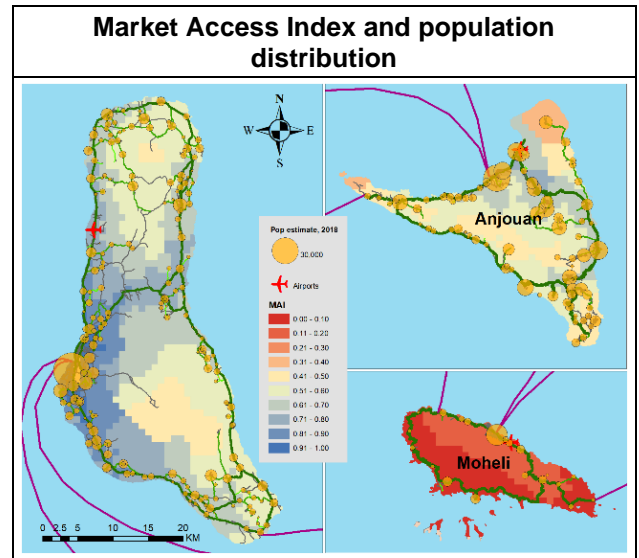
³ WB Gender Data Portal <available:<https://datatopics.worldbank.org/gender/country/comoros>>

⁴ The LSCI indicates a country's integration level into global liner shipping networks, based on liner shipping traffic between countries. The LSCI is an index set at 100 for the maximum value of country connectivity in 2006, which was China.



8. Inter-island connectivity has long been a bottleneck, leaving the domestic markets fragmented. Moheli, which depends on cabotage from Moroni and Mutsamudu for daily consumption, including packaged food and vegetables, is getting more and more isolated from the rest of the country, and even more so from the regional and global markets. While the Comorian economy has been growing steadily at an average rate of 3.5 percent in the last decade, inter-island maritime transport has been shrinking because of limited port infrastructure and maritime transport services. Freight traffic handled by Moheli's Port Fomboni declined from 42,700 tons in 2014 to 33,500 tons in 2017, while the number of ferry passengers between Moroni and Anjouan has more than halved from 71,000 in 2015 to 33,000 in 2018. Because of the subdued demand and inadequate port infrastructure, only one company remains in the passenger market although there used to be 5 private operators running ferry services between the islands. On the freight (cabotage) side, on average only two vessels visit Moheli per week, one each from Moroni and Anjouan, despite nearly daily services between Moroni and Anjouan by 7 operators.

9. Port capacity is limited, especially at Port Fomboni, and port tariffs are generally high in Comoros. In the port sector, there are three main ports at Moroni (Grand Comore), Mutsamudu (Anjouan) and Fomboni (Moheli). While Mutsamudu is a deep seaport with the largest capacity of 70,000 TEUs, Moroni and Fomboni Ports are capacity-constrained. While the capacity of Moroni Port is estimated at 20,000 TEUs or 200,000 tons, the current throughput already exceeds 300,000 tons. Port Fomboni in Moheli is an 80-meter wharf with a 2.4-meter draught, only accessible to small vessels. Because of this inadequacy of infrastructure, passenger ferry and maritime freight operators frequently skip or refuse to call at Moheli, leaving the island most isolated and poorest in the country. The suppressed demand for inter-island transport results in high





inter-island transport costs: Comoros port tariffs are among the highest in the region.⁵

10. In Comoros, the private sector is already active in port operations, however, the institutional capacity remains weak at the Government level. Port Moroni and Mutsamudu are already under 20-year concessions by Moroni Terminal (Bolloré) and Anjouan Stevedoring Company (ASC), respectively. Meanwhile, Port Fomboni is managed by the regional (island) government. The government's regulatory capacity remains generally limited. The country does not have a PPP-specific legal framework.⁶ A single national port authority, Société Comorienne des Ports (SCP), was established in 2013 but remains nonoperational. The current concessions are still managed by the Ministry of Transport (Ministère des Transports Maritime et Aérien, Chargé du Tourisme et de l'Artisanat) and the regional authorities: Autorité Portuaire des Comores (APC) and Etablissement Public du Port Autonome de Mutsamudu (EPPAM), respectively.

11. Because of high costs and inefficiency in the formal maritime sector, many local people rely on relatively cheap but unsafe small boats (i.e., kwassa-kwassa) for their daily transportation between the islands. Although there is no official statistics of maritime accidents in Comoros, not only passengers but also operators are faced with a significant safety risk every day. In 2011, more than 30 people died after their boat sank between Grande Comore and Anjouan. There are about 150 informal service providers operating between the islands. It is estimated that without any proper safety regulation or equipment, more than 5,500 passengers per day (i.e., 2 million per year), especially the poor, cross the Indian Ocean every day, compared with 34,000 passengers by formal ferry. There are four major landing sites where these boats depart and arrive: Chindini (and Ouropveni)⁷ in Grande Comore, Hoani and Itsamia in Moheli, and Bimbini in Anjouan. The beaches are currently managed by local communities, but there is no infrastructure to dock boats or to manage waste from vessels; thus, these informal boat operations risk not only people's lives but also local environment.

12. Although women may not be the prime actors in fishing and port activities,⁸ many women rely on informal maritime transportation. No detailed data is available.⁹ But the improvement of maritime transport and the associated costs reductions would without doubt bring benefits to women as they commute or as they participate in economic activities as traders, importers, exporters and consumers. Women also benefit from design features in ports that address their mobility and safety needs (e.g., visible space and lighting). According to the Women in the Maritime Sector in Eastern and Southern Africa, the maritime sector is male dominated, but there is an opportunity to promote women's employment in in-demand positions, such as seafarers.¹⁰ However, specific barriers for women's participation need to be addressed, such as lack of training and previous mandatory work experience.¹¹ Data also shows that there is also little participation of women at higher level skill jobs, such as port operations.¹²

⁵ World Bank. (2019). Port development and competition in East and Southern Africa: Prospects and challenges.

⁶ The existing two public procurement laws are normally applied: Law 11-027/AU, passed in 2011, and Decree 12-131/PR, passed in 2012. These allow four main procurement processes: open tender (with pre-qualification), restricted tender, competitive tender and direct agreements. Both legislations, however, do not provide a standardized process to evaluate PPP projects.

⁷ Ouropveni is located just 1 km north of Chindini, a major landing site in Grande Comores.

⁸ African Development Bank. (2010). Gender Profile of the Union of the Comoros.

⁹ More detailed gender-disaggregated data will be collected under the pre-feasibility study (F/S) currently under preparation.

¹⁰ World Ocean Summit. *Empowering women in the maritime industry*: <https://www.woi.economist.com/empowering-women-in-the-maritime-industry/>

¹¹ Meenaksi Bhirugnath-Bhookun and Momoko Kitada. *Lost in success: women's maritime careers in Eastern and Southern Africa*: <https://www.nature.com/articles/palcomms201723#Tab1>

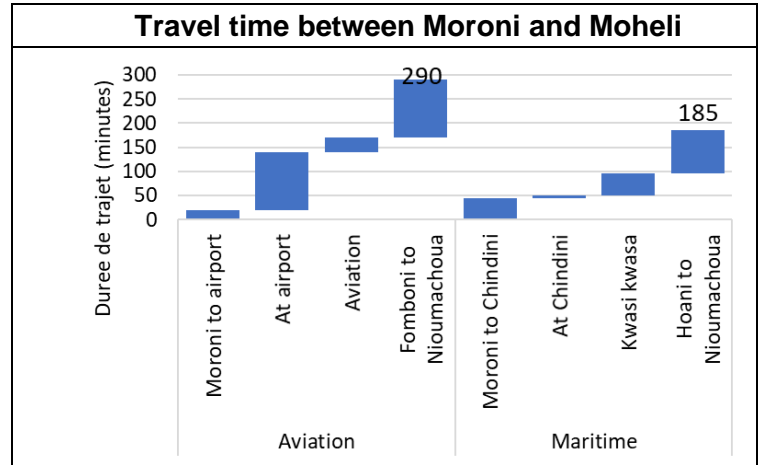
¹² *Loc. Cit.*



13. Air transport services are available between the islands but remain inefficient and too expensive for many Comorian people. Comoros has one international airport at Moroni and 2 regional airports in Anjouan and Moheli. Basic airport infrastructures exist, but the quality of the services is low. Terminal facilities, runways and safety equipment remain to be improved, especially at Moheli Airport. Booking and check-in operations are inefficient and unpredictable, which is hampering growth in tourism, an untapped potential in Comoros, particularly in Moheli. Although the market looks somewhat competitive with 5 regional and national carriers, domestic air fares are still twice to three times higher than maritime ferries. While air transport may be affordable to rich people and international tourists, maritime transport is the main means of transport between the islands for most of the population.

14. Intra-island accessibility, another constraint, particularly in Moheli, has been supported by various donors, including the World Bank, and is improving gradually. The Comorian road network is well established but remains in poor condition, with significant maintenance backlogs. The road network extending about 815 km over the three main islands comprises National Roads (404 km), Regional Roads (296 km), Urban Roads (54 km) and Non-Classified Roads (61 km).

Although the Government has been making efforts toward rehabilitating some of the key national roads (e.g., RN1, RN2 and RN23) with assistance from donors (EU and BADEA), about 45 percent of roads remain in poor or very poor condition, hampering people’s mobility in the islands. Comoros’ transport network and operations are vulnerable to natural hazards and climate change impacts such as tropical cyclones and storms leading to heavy rainfall, landslides, rock falls and flooding. Increasing in the frequency and severity of storms raises challenges for safety and resilience of the economy. In 2019, Cyclone Kenneth hit the country and damaged the road network further (62 km of primary roads, 16 km of regional roads and 12 km of rural roads), revealing the country’s vulnerability to extreme climate events.



15. To bring goods and people to markets, seamless connectivity comprising both intra and inter-island transport infrastructure is needed. In Comoros, rural accessibility within a threshold of 1 km is estimated at 59 percent, leaving about 340,000 people disconnected from the road network. In remote areas, accessibility is often less than 20 percent. Most rural farmers and local businesses still do not have access to the road network and as such they have limited access to economic opportunities or social services. Poor connectivity also impairs access to basic products and services such as food, water, and medical supplies, in particular during and in the aftermath of natural disasters. Poor connectivity also brings difficulty for evacuation and access to relief and recovery efforts. Significant resources are needed to achieve universal accessibility envisaged by the Sustainable Development Goals. It is estimated that about US\$85-100 million would be needed to rehabilitate roads in poor condition and additional US\$11 million needed for annual maintenance. However, the Road Maintenance Fund, which was reorganized into a Road Fund in 2019, mobilizes only US\$1.6 million from fuel levies. Strategic planning and prioritization are essential. To this end, the Bank is supporting the rehabilitation of 37 km of feeder roads under the Integrated Development and Competitiveness Project (P164584) and 13.5 km of national roads under the Post Kenneth Recovery and Resilience Project (P171361), respectively. These investments are expected to be complementary to those under the proposed project.



Relationship to CPF

16. The Government of Comoros envisages to make the country a middle-income economy by 2030, through structural transformation. The Government's strategy is stipulated in the revised National Development Strategy (SCA2D) for the period of 2018-21, which has three main pillars: (i) acceleration of economic structural transformation and sustainable management of environment, (ii) accelerating the development of human capital and promoting social welfare, and (iii) consolidation of governance and promotion of rule of law. To accelerate the structural transformation, the Government aims to develop the infrastructure and financial sectors more and support private sector development potential sectors such as tourism and agrobusiness.

17. The 2019 Strategic Country Diagnostic for Comoros reached broadly similar conclusions to the Government's strategy. It identified three main pathways to lift the country out of its low-growth equilibrium and achieve sustained poverty reduction with greater shared prosperity: (i) overcoming the investment gap, (ii) raising human capital and (iii) protecting and leveraging natural resources.¹³ To attract more foreign and domestic investment, the business environment needs to be improved on both institutional and physical sides. While the credibility and capacity of formal institutions, including judicial and financial systems, remains to be improved, access to infrastructure services has long been an issue. Among others, the SCD identifies investment in inter-island connectivity as a priority, not only to improve efficiency in domestic transactions but also help to reduce the country's fragility, stimulate inclusive growth and mitigate inequality among the islands.

18. Providing more equitable access to infrastructure across the islands is one of the main development objectives in the Country Partnership Framework (CPF) for FY20-24 under preparation and also consistent with the Government's initiative to promote blue economy (National Economie Bleue). The CPF has two focus areas: (i) increase resilience, and (ii) stimulate inclusive growth. For the former, the Bank aims to support improvement of health and nutrition, enhance agricultural and fishery productivity, and strengthen climate resilience, therefore, as a whole, improving people's livelihoods. For the latter, the Bank aims at contributing to people's access to reliable and sustainable infrastructure services, particularly in the energy and inter-island maritime transport sectors. Public infrastructure investments, with possible private sector participation, are expected to increase efficiency in the economy and create more jobs.

C. Proposed Development Objective(s)

The Project Development Objective is to improve maritime transport connectivity and safety among the islands.

Key Results (From PCN)

19. The PDO indicators for the Project include:

- Improved maritime passenger connectivity among the islands, measured by the number of domestic ferry passengers who depart from and arrive at Port Moroni on a monthly basis (gender-disaggregated)

¹³ World Bank. (2019). Comoros Strategic Country Diagnostic: Towards a more united and prosperous union of Comoros.



- Improved maritime freight connectivity among the islands, measured by the volume of freight handled at Port Fomboni on a monthly basis
- Improved maritime transport safety among the islands, measured by the number of maritime accidents on a yearly basis

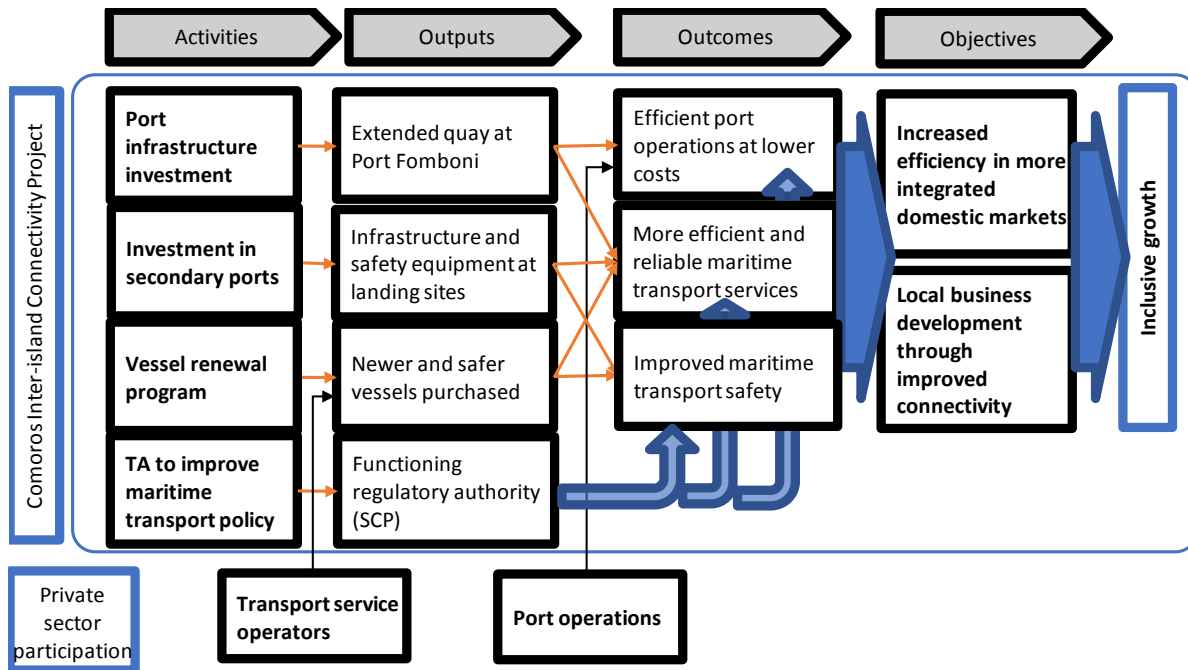
20. Potential intermediate indicators include:

- Operationalization of the Comoros Port Authority (Société Comorienne des Ports)
- Number of formal passenger ferries operating across the islands
- Number of weekly regular formal passenger services between the islands
- Number of registered kwassa-kwassa and other vessels
- Number of kwassa-kwassa passengers who crossed the ocean (gender disaggregated)

D. Concept Description

21. The proposed project aims to support the improvement in maritime transport connectivity and safety among the islands from both physical and institutional points of view, in order to connect people better to markets, integrate the domestic markets in Comoros and increase access to economic opportunities and social services and enhance the climate resilience of the economy. The Project is particularly focused on Moheli island, which despite being the poorest and most isolated region in the country, has an abundance of untapped economic potentials, including production of export commodities and tourism. With more efficient, more reliable and safer inter-island transport services, the Project is expected to ultimately stimulate inclusive growth in Comoros, supporting private sector development, job creation and poverty reduction.

22. Theory of change. The project is attempting to tackle the problems of domestic fragmented market and regional inequalities through intervention in the maritime sector. The Project aims to support the improvement in maritime transport connectivity and safety among the islands from both physical and institutional sides. With more efficient, more reliable and safer inter-island transport services, the Project is expected to connect people better to markets and contribute to integrating the domestic markets, and ultimately, stimulate inclusive growth with more jobs created and poverty mitigated.



23. Based on an ASA carried out by the Bank: Spatial Analysis of Transport Connectivity and Growth Potential in Comoros (P167706), the following four components have been discussed with the Government and identified as priority areas:

24. **Component 1. Port Fomboni (US\$25-42 million).** Although all the three primary ports have certain capacity constraints, Port Fomboni in Moheli island is most constrained. The port only has a draft of 2.4 meters with an 80-meter quay, handling about 30,000 to 40,000 tons of cargo per year. It is difficult for large vessels to approach. As the result, cabotage and ferry operators often refuse to call at Moheli island, suppressing the potential demand for inter-island transport and wrongly incentivizing informal operations.

25. There is a crucial need to rehabilitate Port Fomboni and strengthen its climate resilience. In 2019, the substructure of Port Fomboni was damaged by Cyclone Kenneth, which remains unrepaired, leaving the port highly vulnerable to further damage that can be caused by extreme climate events in the future. Because this is the only port in Moheli, about 40,000 people on the island are currently exposed to the risk of complete isolation from merchandise trade flows.

26. To expand the port capacity and strengthen climate resilience at Fomboni, this component aims to support rehabilitation of critical infrastructure, in particular the breakwater, and build additional protection so as to offer a permanent sheltered area making it safe to accommodate Ro-Pax vessels. Some dredging works, a landing slope, appropriate berthing features and corresponding navigation aids will be part of the project as well. Estimated investment costs could vary from US\$25 to 42 million depending on what infrastructures and substructures are included.¹⁴ The currently ongoing pre-feasibility study assisted by GIF and PPIAF will update detailed cost estimates. Depending on available IDA resources, co-financing with other donors and/or private investors will be considered.

¹⁴ While the National Port Master Plan (2014) estimated the total investment need at 65 million euros, the more recent Fishery Opportunity Study (2019) estimates it at about 40 million euros.



27. MFD approach. To ensure long-term sustainability, a blended finance solution with private sector participation is deemed to be an appropriate solution to finance the Project. It is envisaged that private capital (combination of debt and equity) would be attracted to complement public investment to finance the requisite infrastructure upgrades at Port Fomboni, including superstructure and equipment as well as its operations and maintenance. The country already has PPP (concession) experience in the port sector: The other primary ports at Moroni and Mutsamudu are currently operated under the landlord concession agreements. However, given the relatively small size of Port Fomboni, and the need to provide infrastructure for passenger transport operations, full private capital or commercial financing requiring full repayment through passenger fares and port fees and charges may not be viable. A publicly supported framework may be needed, thus, the proposed blended finance approach. With the support by GIF and PPIAF, a pre-feasibility study is currently being conducted to explore possible PPP structuring options. The outcome of the study will inform the preparation and appraisal of this IPF.

Preliminary cost estimates and potential scenarios

Items	Scenario 1		Scenario 2		Scenario 3	
	Cost	Coverage	Cost	Coverage	Cost	Coverage
Breakwater	4,500,000	100%	4,500,000	100%	4,500,000	100%
General Cargo Quay + RoPax Ramp	4,600,000	100%	4,600,000	100%	4,600,000	100%
Fishing Quay		0%	2,100,000	100%	2,100,000	100%
Dredging Basin -4.5 m	4,550,000	50%	9,100,000	70%	13,000,000	100%
Dredging Access Channel -5.0 m	4,600,000	100%	4,600,000	100%	4,600,000	100%
Yard Reclamation	624,000	40%	1,560,000	60%	2,600,000	100%
Utilities/Equipment	600,000	40%	1,500,000	60%	2,500,000	100%
Miscellaneous/Contingencies (25%)	4,868,500		6,990,000		8,475,000	
TOTAL	24,342,500		34,950,000		42,375,000	

28. Component 2. Improvement of secondary ports (US\$2 million) – To be integrated into Component 1. This component aims at supporting secondary ports on the three islands. There are four major landing sites where kwassa-kwassa boats depart and arrive: Chindini and Oupoveni in Grande Comore, Hoani and Itsamia in Moheli, and Bimbini in Anjouan. To improve safety and efficiency in these informal boat operations and protect coastal environment, the project will support minimum sheltering improvements, building landing slopes, disposal facilities, and implementing basic navigation aids to assist with approaches and landings. Port design will also ensure that it incorporates design features to improve people’s with disabilities access to port infrastructure and services (e.g., ramps, wide entrances, priority seating, proper signalization and visualization of information) and facilitating women’s experience of traveling by addressing identified infrastructure constraints that affect them disproportionately (e.g., lack of lightning and visible spaces, which can be enablers of violence, mainly at night)

29. Component 3. Maritime safety and Vessel Renewal Program (US\$2 million). This component supports the Government’s efforts toward improving maritime transport safety between the island through strengthening the regulatory capacity and formalizing informal kwassa-kwassa operations and making them more efficient, greener and safer. In addition to technical assistance for capacity building at relevant ministries and agencies, the component will finance a vessel renewal program for informal transport service operators to renew their vessels, scraping old and unsafe boats and register new boats properly. In addition, it is expected that fleet renewal will reduce GHG emissions from maritime transportation. Currently, there are about 150 kwassa-kwassa boats operating between the islands, most of which are old



and normally accommodate up to 12 passengers, but without any safety equipment installed. In theory, it is more efficient and economically viable to operate with a fewer number of vessels with more capacity, however, local operators cannot afford them because of the lack of access to financial/local capital market, which is very thin in Comoros. To fill the gap, the component aims to provide a partial subsidy for vessel renewal.

30. Typical new craft could include low-draft small passenger boats (around 25 pax) with slope landing ability, as well as somewhat larger units able to accommodate both passengers and one or two vehicles (50 pax/1 car or 25 pax/2 cars f.i.) Each vessel costs US\$150,000 to \$350,000, depending on the size. The component does not intend to finance all costs but partially subsidize private purchases. Even with a relatively small amount of allocation, a large number of vessels could be renewed. As part of the GIF and PPIAF funded pre-feasibility study, the demand for new fleet and feasible options for such a program are being examined.

31. **Component 4. Implementation support and capacity building (US\$2 million).** This component supports the implementing entity for the Project as well as necessary preparatory works, such as detailed design and safeguard documents.

32. The component also 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. It is imperative to operationalize the single national port authority, Société Comorienne des Ports (SCP), which was created in 2013 to replace the separate port authorities on the different islands but remains nonoperational. With the consolidated and augmented capacity, it should play the landlord role i.e. the ultimate public infrastructure owner and, also, optimize related investments across the three islands. In this capacity, the SCP should also become the unique authority supervising concessionaires.

33. The capacity of other relevant ministries also needs to be strengthened. The Ministry of Transport (MoT) is responsible for all technical aspects of the island-state's national port and maritime policies and is the main policymaking organ for implementing and monitoring concession agreements for port operations, while the Ministry of Finance is responsible for all financial aspects. Implementation of safety regulations in maritime transport is the responsibility of the Ministry of Interior (Police and National Security). Informal landing sites are managed by local communes. The shortcomings of the Comoros' port sector institutions include lack of policymaking at the local level, and the lack of a coordinated approach in executing the ministries' national port policies, including safety.

34. To this end, the component will provide technical assistance to support:

- Capacity building of SCP
- Implementation of International Convention for the Prevention of Pollution from Ships (MARPOL) to protect the maritime environment
- Development and implementation of a national maritime transport safety strategy
- Formalization/registration of the informal inter-island transport operations
- Gender Action Plan to address key barriers to women's mobility and to promote women's employment participation in the maritime transport sector, including medium and high-level skills. Activities will be identified through a gender assessment, which examines (a) the differences between women and men in usage of the port and inter-island maritime transport services, and (b) employment gaps and opportunities in the maritime transport sector.



35. **Component 5: Contingent emergency response (no allocation).** This component will facilitate access to rapid financing by allowing reallocation of uncommitted project funds in the event of an eligible crisis.

Legal Operational Policies	Triggered?
Projects on International Waterways OP 7.50	No
Projects in Disputed Areas OP 7.60	No

Summary of Screening of Environmental and Social Risks and Impacts

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 support the improvement in maritime transport connectivity and safety among the islands from both physical and institutional points of view, thereby, connecting people better to markets and contributing to integrating the domestic markets in Comoros.

The proposed project will be National level to cover the three islands in Comoros that will be implemented around the Fomboni area on Moheli island, and in several other coastal areas in Grande Comore and Anjouan islands mainly the Port Fomboni in Moheli and secondary ports Chindini and Ouropveni in Grande Comore, Hoani and Itsamia in Moheli, and Bimbini in Anjouan. These selected sites are in coastal zones without any environmental sensibility. With as main components:

- Component 1. Infrastructure improvement of Port Fomboni aims (i) to support rehabilitation of critical infrastructure, in particular the breakwater, and building of additional protection to accommodate Ro-Pax vessels., (ii) to conduct some dredging works, (iii) to build a landing slope to improve berthing (iv) and to install of equipment for navigation aids.
- Component 2. Improvement of secondary ports on the three islands on the four major landing sites where kwassakwassa boats depart and arrive: Chindini (and Ouropveni), Hoani, Itsamia, and Bimbini. This component will support minimum sheltering improvements, building landing slopes, disposal facilities, and implementing basic navigation aids to assist with approaches and landings.
- Component 3. Vessel Renewal Program to encourage transport service operators to renew their vessels with the partial subsidy for vessel renewal to access to the financial market.
- Component 4. Implementation support and capacity building (US\$2 million). This component supports the implementing entity for the Project as well as necessary preparatory works, such as detailed design and safeguard documents.
- Component 5. Contingent Emergency Response (CERC). This component will facilitate access to rapid financing by allowing reallocation of uncommitted project funds in the event of a natural disaster, either by a formal declaration of a state of emergency or upon a formal request from the Government of Comoros.

Project activities are relevant to ESF for Infrastructure improvement of primary and secondary ports (Component 1) and Maritime safety and Vessel Renewal Program (Component 2) are anticipated to generate : (i) port waste and pollution control, (ii) Ecological impacts of dredged materials, (iii) perturbation of marine habitat and potential damage to marine biotopes during dredged, (iv) occupational health and safety during construction and operations; (v) community health, safety, and security risks, (vi) pollution from the dredged material, and (vii) impacts on fishery and livelihoods for local population during construction. In addition, the vessel renewal program activities are relevant to the ESF related to the decommissioning of old vessels and the acquisition and licensing of new vessels. Technical assistance activities (Component 3) will support the institutional framework and capacity of the Government and relevant ministries, including aspects of E&S risk management. The Contingent Emergency Response Component (CERC) (Component 5)



allows for rapid reallocation of project proceeds in the event of a natural or artificial disaster or crisis that has caused or is likely to imminently cause a major adverse economic and/or social impact. This CERC component will apply ESF principles to identify E&S risks that may need attention.

The Project will be managed by a project implementation unit (PIU) created under the Ministry of 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. Ministry of Transport will be expected to develop and implement an Environmental and Social Management System (ESMS) for operation of the Fomboni Port and the four secondary Ports which includes measures for managing risks and impacts related to the operation phase. However, this entity doesn't have any capacity to manage the potential environmental and social impacts of the proposed project and is not familiar with Bank safeguard policies and the ESF standards. An international E&S firms will be hired by the Ministry of Transport to prepare the required ESA studies and Resettlement Action plans on the basis of ESA Terms of Reference (TORs) and RAP ToRs approved by the Bank. A detailed E&S capacity and systems assessment vis-a-vis of all E&S standards will be undertaken during preparation following the Bank Guidance Note on Assessing Borrower Capacity at the project level. Corporate oversight will be maintained by the RSA who will approve all safeguards instruments.

Note: To view all the Environmental and Social Risks and Impacts, please refer to the Concept Stage ESRS Document.

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APPROVAL

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