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ACCELERATING SUSTAINABLE AND CLEAN ENERGY ACCESS TRANSFORMATION IN MADAGASCAR (ASCENT) (P515164)

ENVIRONMENTAL AND SOCIAL SYSTEM ASSESSMENT

Draft

March 2026

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List of Acronyms

ADER	Rural Electrification Agency (Agence de Développement de l'Electrification Rurale)
ADR	Alternative Dispute Resolution
AMI	Advanced Metering Infrastructure
APA	Annual Performance Assessment
ARELEC	Malagasy Electricity Regulator (Autorité de Régulation de l'Électricité)
ASCENT	Accelerating Sustainable and Clean Energy Access Transformation
CDMU	Compact Delivery and Monitoring Unit
CE	Cellule Environnementale (Environmental Unit)
CHS	Community Health and Safety
CNaPS	Caisse Nationale de Prévoyance Sociale (National Social Security Fund)
COVID 19	Coronavirus 19
CP	PforR Core Principles
CSES	Comité de Suivi Environnemental et Social
CTE	Comité Technique d'Évaluation
DECIM	Digital and Energy Connectivity for Inclusion in Madagascar
DLIs	Disbursement Linked Indicators
DOE	Directorate of Expropriation Operations
DoR	Department of Resettlement
DOSHS	Directorate of Occupational Health and Safety
DRE	Decentralized Renewable Energy
DUP	Déclaration d'Utilité Publique
E&S	Environmental and Social
EAPP	Eastern Africa Power Pool
EBITDA	Earnings Before Interest, Taxes, Depreciation, and Amortization
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
ESAP	Energy Supply and Access Project
ESF	Environmental and Social Framework
ESHS	Environmental, Social, Health and Safety
ESHSRIM	Environmental, Social, Health and Safety Risk and Impact Management
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESMMP	Environmental and Social Management and Monitoring Plan
ESSA	Environmental and Social System Assessment
FNED	National Fund for Decentralized Electrification (Fonds National pour l'Electrification Décentralisée)
GBV	Gender-Based Violence
GDP	Gross domestic product
GHG	Greenhouse Gas
GoM	Government of Madagascar
GRM	Grievance Redress Mechanism
HFO	Heavy Fuel Oil
IPF	Investment Project Financing
IVA	Independent Verification Agent
JIRAMA	Jiro sy Rano Malagasy (Madagascar national electric and potable water supply utility)
LEAD	Least-Cost Electricity Access Development
LPG	Liquefied Petroleum Gas
LV	Low Voltage
M300	Mission 300
MATSF	Ministry of Land Use Planning and Land Services
MDA	Ministries Departments and Agencies
MECIE	Mise en Compatibilité des Investissements avec l'Environnement
MEF	Ministry of Economy and Finance
MEH	Ministry of Energy and Hydrocarbons
MLECSSL	Ministry of Labor, Employment, Civil Service and Social Legislation

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MoLUPLS	Ministry of Land Use Planning and Land Services
MPA	Multi-phase Programmatic Approach
MPS	Ministry of Population and Solidarity
MV	Medium Voltage
NPE	National Energy Policy
OHS	Occupational Health and Safety
ONE	Office National pour l'Environnement
ORE	Office de Régulation de l'Electricité, or Office of Electricity Regulation (became ARELEC in 2025)
PAP	Program Action Plan
PAP	Program Action Plan / Project Affected Person
PDO	Project Development Objective
PforR	Program for Results
POM	Program Operational Manual
PUE	Productive Uses of Energy
PURE	Productive Use of Renewable Energy
PWD	Persons With Disabilities
QHSE	Quality, Health, Safety and Environment
RA	Result Area
RAP	Resettlement Action Plan
RBF	Results-Based Financing
REP	Rural Electrification Program
SDG7	Sustainable Development Goal 7
SEA/SH	Sexual Exploitation and Abuse / Sexual Harassment
SEA-H	Sexual Exploitation and Abuse, and Harassment
SH	Sexual Harassment
SOP	Standard Operations Procedure
TA	Technical Assistance
ToR	Terms of Reference
WB	World Bank

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Executive Summary

Introduction

Madagascar's population is estimated at 32 million in 2025, growing at 2.4 percent annually. The demographic profile is predominantly young, with two thirds under the age of 30. This creates both opportunities for inclusive growth and significant pressures on employment, service delivery, and social stability. Energy insecurity and institutional fragility have led to frequent electricity and water outages, particularly in urban centers. JIRAMA, the vertically integrated state-owned electricity and water utility company, has struggled to meet demand, prompting rotating blackouts in major cities. This deterioration in essential services catalyzed widespread public mobilization, beginning in September 2025 with youth led protests (GEN-Z) demanding universal access to water and electricity, structural reform of the energy sector, and greater social equity. With over 70 percent of the population lacking reliable electricity (among the lowest in Sub-Saharan Africa and in the world), and more than 75 percent living below the poverty line, the inability to ensure basic service delivery led to a change in leadership and the establishment of a transitional government.

The World Bank is assisting the government with policy reforms to attract investments in generation and renewable energy along with the promotion of the regional energy trade in the Eastern Africa Power Pool (EAPP), modernizing the electricity network for the needs of a modern economy and increasing energy access are among the key areas of the Bank's deepening engagement in the sector. To accelerate the access to modern and affordable Energy services, the World Bank and the African Development Bank (AfDB) have launched the Mission 300 initiative, aiming at providing electricity access to 300 million people in Sub-Saharan Africa by 2030.

The proposed Accelerating Sustainable and Clean Energy Access Transformation (ASCENT) program is part of the regional Multiphase Programmatic Approach (MPA) in Eastern and Southern Africa approved by the World Bank's Executive Directors on November 28, 2023, and became effective on April 5, 2024.

The institutional structure for energy sector development in Madagascar is composed of four main entities: the Ministry of Energy and Hydrocarbons (MEH), the regulator (ARELEC), the rural electrification agency (ADER), and JIRAMA. MEH sets government policy, provides strategic coordination of the energy sector and oversees JIRAMA's activities.

Related World Bank energy activities in Madagascar

The World Bank's ongoing energy portfolio in Madagascar includes two operations; (i) the Least-Cost Electricity Access Development project (LEAD) and ii) the Digital and Energy Connectivity for Inclusion in Madagascar project (DECIM). These projects remain flagship projects supporting the M300 initiative in the country (see details below). Under this initiative, the Madagascar National Energy Compact was launched in January 2025 with the goal to guaranteeing access to reliable, affordable and sustainable electricity to 80% of the population by 2030 and to guaranteeing access to improved and clean cooking solutions for at least half (50 %) of the population by 2030.

The implementation of the LEAD and DECIM projects supports grid and off-grid electrification, technical assistance, and sector reforms focusing on new connections, network extension, and operational improvements. In addition to the investments projects, the World Bank is also supporting the government and the electric utility JIRAMA, under the ongoing Development Policy Financing series, to implement necessary reforms that will maintain the reform trajectory of JIRAMA to ensure its financial viability and encourage private sector participation to unlock additional resources. The ambition of the Energy compact is to increase the share of renewable energies to at least 85% by 2030 with support from the private sector.

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Related government activities

Within the framework of the Madagascar M300 Energy Compact 2025-2030, Madagascar adopted a National Energy compact, aligned with the United Nations Sustainable Development Goal 7 (SDG7), that serves as a roadmap to accelerate access for all, while ensuring affordable, reliable, inclusive, sustainable and clean energy for the Malagasy people. The Malagasy Government is committed to guaranteeing access to reliable, affordable and sustainable electricity to 80% of the population by 2030 and to guaranteeing access to improved and clean cooking solutions for at least half (50 %) of the population by 2030. In terms of access to electricity, this would represent an increase of 44% compared to the current access level of 36%, an average annual gain of 2.2 million people per year, of which approximately 0.4 million would gain access through JIRAMA and 1.8 million through private sector mini-grids and solar home systems. When it comes to cooking, around 4.1 million people, or 14% of the population, today have access to improved or clean cooking technologies. To achieve this ambitious objective of 50%, exponential growth would therefore be required; it would be driven by significant investments from the private sector, which would allow 8.6 million people to have access to it in 2026, increasing to 12.4 million in 2028 and almost 18 million in 2030.

The Compact constitutes the overall Government program supported by the PforR ASCENT program and provides a unified framework for accelerating access to electricity and clean cooking, strengthening sector planning, modernizing regulation, and mobilizing large scale private investment. The Compact is aligned with the National Energy Policy (NPE 2015–2030), which prioritizes renewable energy development, competitive least cost planning, and universal access. It further builds on sector diagnostics, including the Geospatial Least Cost Electrification Plan (GLCEP), the updated Least Cost Development Plan (PDMC), and the Integrated Energy Access Plan (PEI). By consolidating policy, regulatory, and planning reforms under a single results-oriented framework, the Compact ensures coherence across on grid, mini grid, off grid, and clean-cooking strategies, and clarifies the roles of the various government stakeholders (MEH, ARELEC/ORE, ADER, and JIRAMA) involved in delivering the access agenda.

Together, the Madagascar M300 Energy Compact and its embedded utility reform plan constitute the full boundary of the Government program supported by ASCENT Madagascar PforR. The PforR will therefore focus on increasing access through grid and DRE solutions, improving JIRAMA's financial viability, strengthening governance, accelerating clean cooking adoption, and supporting the enabling conditions required to deliver 2030 access targets.

ASCENT Program Development Objective

The ASCENT Madagascar Program Development Objective (PDO) is to improve financial and operational performance of JIRAMA and increase access to sustainable and clean energy in Madagascar.

ASCENT Madagascar Program for Results Description

The government objective for this program is to guarantee access to reliable, affordable and sustainable electricity to 80% of the population by 2030 and access to improved clean cooking solutions for at least half (50 %) of the population by 2030. Within this broad goal, the specific objectives of the PforR financing is to improve financial and operational performance of JIRAMA and increase access to sustainable and clean energy in Madagascar.

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The ASCENT MPA results chain recognizes that access to energy contributes to outcomes at multiple levels. At the community and national level, it creates economic opportunities, enhances access to human development services and health and education outcomes, enables the digital economy, and improves quality of life and resilience. At the regional level, it increases demand for grid supply or private-sector companies' demand for supply of DRE solutions, delivering economies of scale and attracting private capital. At the global level, it contributes to climate change mitigation, as well as adaptation through improving pandemic and disaster preparedness and reducing causes of fragility

The PforR results areas (Ras) are as follows:

- Increased access to electricity (on-grid)
- Improved utility financial viability/performance (revenue increase, debt and arrears payment)
- Improved utility governance and management
- Expanded Energy Access through Decentralized Renewable Energy (DRE)
- Deployment of Clean and Improved Cooking Solutions

Disbursement Linked Indicators (DLIs) for each of the five Result Areas have been developed.

ESSA Scope and Methodology

As part of project preparation, the Bank team has prepared this Environmental and Social System Assessment (ESSA) for the proposed Program activities in Madagascar in order to examine existing environmental and social management systems within the power sector. An Action Plan has been provided to ensure that this PforR is carried out within the framework of World Bank PforR and Malagasy environmental, social, health and safety (ESHS) requirements by avoiding, minimizing, or mitigating possible adverse impacts. The ESSA provides an indication of the robustness of the Country system in managing ESHS risks and impacts, and to evaluate the extent to which the system is consistent with the PforR Six Core Principles and the corresponding Key Planning Elements. Specifically, the ESSA seeks to: (i) identify the Program's potential ESHS effects, (ii) assess the current system for Environmental, Social, Health and Safety (ESHS) management applicable to the Program, including a review of institutional responsibilities; (iii) evaluate the capacity of the relevant institutions to implement requirements under the system; and (iv) recommend specific actions to address gaps if any, in the system, by providing material measures for improving program design and implementation. Measures for addressing the identified gaps are organized into a Program Action Plan (PAP).

ESSA Scope and Methodology

- The Bank applied several approaches during the development of the ESSA, including: Screening Program activities were undertaken during the concept stage to identify potential ESHS effects of the program and to confirm that no activities that meet the defined exclusion criteria are included in the PforR;
- Comprehensive desk review of relevant country policies, legal, regulatory and institutional frameworks, and program documents that address ESHS aspects relevant to the Program; and
- System, Institutional and Capacity Assessments conducted to consider the applicability 'as written' versus 'as practiced' for ESHS effects management and consistency with the six 'PforR core principles'. The ESSA team held consultations that brought together multiple stakeholders (see below).

PforR Institutional and Implementation Arrangements

The PforR will rely on Madagascar's national Environmental and Social Management Systems, including relevant laws, regulations, and institutional arrangements. The ESSA confirms consistency with the six core PforR principles outlined in paragraph 9 of the "World Bank Policy for Program-for-Results Financing" in order to effectively manage Program risks and promote sustainable development. These are:

- Environment and Social Management

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- Natural Habitats and Physical and Cultural Resources
- Public and Worker Safety
- Land Acquisition
- Indigenous Peoples and Vulnerable Groups[1]
- Social Conflict

In performing this analysis and developing the Action Plan, ESSA considered existing regulations and policies, their legal and practical applicability at the program level, institutional capacity, and the effectiveness of implementation in practice. In addition, the ESSA included assessment of management capacity with regard to (a) distributional equity, affordability and gender constraints; (b) consultation processes; and (c) risk of creating or exacerbating conflicts. The findings of the ESSA were factored into the overall integrated risk assessment, which will be reexamined and revised as necessary.

The institutional structure for energy sector development in Madagascar is composed of four main entities: the Ministry of Energy and Hydrocarbons (MEH), the regulator (ARELEC), the Rural electrification agency (ADER), and JIRAMA. MEH sets government policy, provides strategic coordination of the energy sector and oversees JIRAMA's activities. These and other relevant government stakeholders in the areas relevant

An ESHS risk screening of the proposed Program activities (sub-projects) will be undertaken during PforR implementation to identify potential ESHS effects during screening of proposed sub-projects to confirm that there are no Program activities that meet the defined exclusion criteria that are included in the Program, in line with the World Bank guidelines for PforR.

Results of the review of national ESHS management systems

Comprehensive desk review of the existing national system consisting of policies, legal, regulatory and institutional frameworks, Program documents, and similar ESSAs carried out in the recent past. The review examined the set of applicable national level policy, legal, regulatory, and institutional frameworks that are relevant for the management of ESHS effects in the Energy sector. In addition, the assessment examined technical documents from previous and ongoing WB PforR Programs.

The ESSA identified gaps that would potentially undermine the application of the country systems for effective management of environmental, social, health and safety (ESHS) risks and impacts under the Program. Despite the robustness of the country's ESHS system legal and regulatory framework, the ESSA identified some institutional weaknesses/gaps including: (i) low commitment to E&S sustainability leading to inadequate resourcing and accountability for ESHS risk management; (ii) fragmented legislative and institutional frameworks for managing social risks and impacts; (iii) ineffective GRM systems; (iv) inadequate targeting and inclusion of vulnerable groups in participating and accessing Program benefits; (v) inadequate public consultation; (vi) limited monitoring and reporting on ESHS risks and impacts management, (viii) inadequate collaboration and coordination of ESHS activities among planned lead agencies to manage ESHS risks; (ix) inadequate ESHS staffing at the implementing agencies; (x) lack of inclusion and/or implementation of ESHS clauses the contract and bidding documents; (xi) inadequate contract management and supervision of Environmental and Social Management Plans (ESMPs).

Stakeholder consultations

In February 2026, various key Stakeholders were engaged to enable the World Bank to understand the existing systems and institutional experiences with regard to the application of the ESHS systems for the management of ESHS effects. To this end, the ESSA process involved institutional analysis to assess the capacity of key institutions to effectively implement the required ESHS actions. The assessment of these key institutions focused on their

[1] There are no indigenous peoples present in Madagascar.

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capacity for E&S risk management, public and worker safety, labor-related issues and inclusion of vulnerable groups including the women, youth, and persons with disability. Some of the key relevant stakeholders consulted included: Ministry of Energy and Hydrocarbons (MEH), JIRAMA (the national electricity company), ADER (the national rural electrification agency), ONE (the National Environmental Agency), the Ministry of Work, Employment and Public Function, and DOE (the department at MATSF responsible for regulating and overseeing resettlement).

An ESSA validation and disclosure workshop was held In line with World Bank Policy for PforR financing and the World Bank's Access to Information Policy on March 26, 2026. At this workshop, the draft ESSA was disclosed and its findings presented to stakeholders. Based on their input and feedback, the report was revised. Once final approval is obtained, the final ESSA report will be publicly disclosed in-country websites and on the World Bank external website prior to the Program's WB Board approval.

Possible PforR activities (sub-projects)

The following are among the various possible activities that may be considered for implementation in support of achievement of PforR goals:

- Solar PV development by hybridization of JIRAMA isolated thermal centers
- Distribution grid reinforcement and expansion
- Construction of renewable energy power plants with Independent Power Producers
- ,
- Improvement of Transmission Networks
- Construction of new Transmission lines

Installation of new connections, including Medium Voltage (MV) connections

- Three-phase connections
- Single-phase connections
- Strengthen and modernize transportation and distribution networks, including substations and lines
- Maintenance, overhaul or replacement of JIRAMA old generation units, including rehabilitation of existing hydropower plants
- Deployment of Productive Use of Renewable Energy (PURE) installations
- Electrification of public institutions (schools, health centers, administrations)

Possible risks and impacts

Risks and impacts based on implementation of the various possible activities described above include: (i) Land disturbance and habitat alteration during construction of new connections; (ii) Depending on the location, nature of habitant and scale traversed by the investments, impact on the area biodiversity and habitat ; (iii) noise, and vibration from infrastructure works; (iv) soil erosion; hazardous materials handling; (v) waste generation and management including e-wastes and end-of-life batteries, (vi) SEA/SH associated with labor influx; (vii) occupational health and safety (OHS) risks (viii) community health and safety (CHS) during transport/works. Contextual risks are influenced by Madagascar's high exposure to hazards and socio-political shocks, which have a direct impact on energy sector operations. Implementing agencies (MEH, JIRAMA) of ongoing projects (LEAD and DECIM) have meaningful experience under safeguards and are strengthening Environmental and Social Risk Management capabilities but remain rated "Moderately Satisfactory" in environmental and social performance. Political dynamics and reputational issues, including prolonged governance challenges in the sector and recurring water and power outages, have contributed to political turmoil.

Overall ESHS risks of the PforR component were assessed as Substantial. Nonetheless, the Bank has underlined that adverse impacts are expected to be limited, site-specific and temporary and can be effectively minimized and/or mitigated with the adoption of proper environmental and social impact management procedures. The most adverse impacts are expected to be site-specific, temporary and limited during the construction phase. All

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investments will undergo an ESHS risks and impact screening and assessment process as per the national environmental and social management systems requirements.

Consistent with the requirements of the Bank PforR Policy, the proposed Program operation will not finance activities that pose high ESHS risks. The principle applies to Program activities that meet the exclusion criteria regardless of the borrower's capacity to manage such ESHS effects. In the PforR context, exclusion means that an excluded activity is not included in the identified program of expenditures (investment menu). In addition, an activity is not included if it requires the completion of a non-eligible activity to achieve its contribution to the PDO or any specific DLI.

Proposed sub-project activities will be screened against the six PforR core principles and the relevant country systems, which will apply to all investments as a mechanism for avoiding, minimizing, or mitigating adverse ESHS risks/impacts. All of this will be captured in the POM that will specify the suitable criteria through which the program components will be screened.

The ASCENT Madagascar PforR Program is expected to deliver significant ESHS benefits which that will vary depending on the investment's menu. The potential ESHS benefits will include, but not limited to:

- Increased access to electricity, leading to Improved clean environment and living conditions through the use of cleaner energy;
- Reduction in use of fossil fuels for powering generators and other equipment, leading to reduced emissions of air pollutants, greenhouse gases (GHG);
- Improved safety on faulty transmission lines (e.g. reduction on electrocution);
- Reduced dependency on kerosene and firewood as sources of energy for cooking and lighting, which, in turn, will lead to reduced cutting of trees and reduced carbon emissions;
- Improved indoor air quality as a result of using less firewood and kerosene;
- Improved and reliable electricity services in Madagascar;
- Improvements in quality of public service delivery such as schools and health care facilities;
- Contribution to the inclusion of vulnerable households in line with the last mile connectivity program objectives;
- Reduced energy losses; and
- Improved financial sustainability for JIRAMA.

The Program is expected to have direct and indirect effects on the EHS and climate change aspects. As mentioned earlier, the risks and impacts of this Program will mainly be limited to the construction phase. The risks are considered site specific, temporary in nature and reversible.

The potential environmental, health and safety (EHS) risks and impacts, include, but are not limited to:

- Disturbance and loss of existing vegetation and potential impact to flora and fauna species;
- Localized noise and air pollution (dust and emissions) from construction activities;
- Soil contamination and underground water pollution from spillage of oil and fuel associated with construction works;
- Soil erosion and sedimentation of waterways especially during construction of LV transmission lines and substations;
- Contaminated soil and water, along with worker exposure to toxic substances, can result when electronic and hazardous waste—such as broken meters, cables, transformers, solar panels, batteries, and related packaging—is not properly managed, particularly in areas lacking effective recycling and disposal systems.
- Degradation impacts from sourcing of construction material from quarry and borrow pits for use in civil works;

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- Scenic quality deterioration and environmental pollution from dumping of excavated material and impact to physical cultural resources;
- Occupational Health and Safety incidents/accidents to workers at construction sites and community health and safety risks to the public, especially electrocution and falls from heights, as well as road safety risks, linked to increased movement of construction vehicles, transport of equipment and materials;
- Increased generation and unsafe disposal of construction solid waste and wastewater;
- Traffic obstruction and increased traffic related traffic-related safety risks;
- Temporal disruption of public access to residential and businesses, especially during excavations near structures that have encroached the public land; Disruption of existing infrastructure or services such as drainage, sanitation, telecommunication utilities, power, and water supply especially during the construction phase;
- Water (surface and groundwater) pollution risks from transport, treatment and disposal of wastewater and fecal sludge from pit latrines/ septic tanks at camp sites, and other onsite sanitation facilities, if not properly handled;
- At operational and maintenance phase, environmental risks and impacts are expected from the generation of electronic waste from used solar panels and batteries, which if not appropriately managed may cause toxic elements to leach underground and cause soil and water pollution.

Cumulative impacts may occur. This possibility will be assessed on a case-by-case basis (that is, by sub-project).

The proposed investments under ASCENT may pose potential negative social risks and impacts. The potential negative social risks and impacts will include, but not limited to:

- Inadequate Environment and Social Staffing and budget allocation for ESHS risks management.
- Loss of livelihoods through temporary displacements of traders, disruptions to businesses and public services, during construction of low voltage (LV) transmission lines;
- Disruption of access and damage to public utilities and/or private properties;
- Destruction of structures, crops and trees;
- Labor influx risks which may lead to an increase in crime, insecurity and upset community dynamics;
- Use of Forced, child labor and abuse;
- Potential public and community health and safety risks such as traffic accidents;
- Increased Gender-Based Violence (GBV) and Sexual Exploitation and Abuse and Sexual Harassment (SEA-SH);
- Lack of transparency and trust by communities due to poor consultations and stakeholder engagement with project beneficiaries, vulnerable and marginalized groups;
- Discrimination against the vulnerable groups, especially women and minorities in selecting Program participants, lack of consideration of Persons with Disabilities (PWD) needs, access and suitable infrastructure;
- Lack of clear guidelines presents the risk of targeting and exclusion of vulnerable groups for Program benefits;
- Gender inequality in employment opportunities;
- Elite capture or political interference in beneficiary targeting of the most deserving as well as selection and prioritization of investments;
- Bias of contract(s) awarded to known or particular groups of contractors;
- Inadequate mechanisms for stakeholder identification, engagement, monitoring and feedback;
- Ineffective grievance redress and feedback mechanisms;
- Landuse conflicts and access restrictions due to the sub-project during any phase of the same.
- Temporal disruption of public access to residential and businesses, especially during excavations near structures that have encroached the public land;
- Spread of sexually transmitted diseases including HIV/AIDs, Sexually Transmitted Diseases (STDs), and other communicable diseases such as tuberculosis, cholera, etc.;

Program E&S Risk Rating

Because of the significant expected geographic dispersion of the location of PforR activities location, different scales of proposed investments, the potential direct, indirect and cumulative environmental and social risks and impacts associated with many sub-projects in the Program, the capacity of the government stakeholders jointly responsible for implementing ASCENT sub-projects and managing possible ESHS impacts, and gaps identified in the institutions responsible for managing environmental, social and health risks in the country, the overall ESHS risk of the Program is rated as Substantial. However, as mentioned earlier, the program will exclude projects that have significant negative environmental, social and impacts that are sensitive, diverse, irreversible or unprecedented.

ESSA Recommendations

To address Environmental Social, Health and Safety (ESHS) Management institutional and systemic weaknesses, the ESSA has proposed as part of the overall Program Action Plan (PAP) measures to strengthen the ESHS Risk Management to enhance performance during implementation of the program. To fill the gaps identified in the ESSA, the Program will support specific measures to enhance the performance of the ESHS risk management systems at the Program level. The PAP's key areas of focus will be (i) Strengthening Environmental, Social, Health and Safety Management Systems (ESHSMS) – which includes establishment of fully staffed ESHS specialists at the participating institutions, and operationalization of ESHS risk and impacts management (ESHRIM) manual; (ii) Capacity building and training of the staff of the various government stakeholders to streamline the ESHS processes and procedures; (iii) Enhancing stakeholder and GRM feedback mechanisms - support strengthening stakeholder feedback and grievance redress mechanisms, that are gender sensitive and incorporates handling of GBV cases, and, (iv) Strengthen the implementation and monitoring of the ESHS risk management, that will include enhancement of assessing ESHS performance and verification protocol.

All the sub-projects will be required to follow the guidelines of the ESHS risks and management that have been identified in this ESSA and included in the Program Operations Manual (POM). The POM forms part of the Financing Agreement of the Program. In addition, the ESSA has recommended ESHS mitigation and enhancement measures in the Program Action Plan. The PAP shall be legally binding and incorporated into the Financing Agreement of the Program.

Key actions are summarized in the table ES 0-1 below.

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Table ES 0-1: Proposed Environmental, Social, Health and Safety (ESHS) Program Action Plan

No	Action Description	Source	Responsibility	Timing		Completion Measurement
1.	Set up of an appropriate complaint handling mechanism for the Program	Environmental and Social Systems	ADER, MEF, MEH, JIRAMA	Due date	31 December 2026	• Complaint handling mechanism established within 3 months following the Program effectiveness
2.	Operationalization of ESHSRIM, by development of all ESHS procedures documented for all sub-projects.	Environmental and Social Systems	MEHoE / PMU and Implemening agencies SafeguardESHS specialists	Other	Within 6 months of program effectiveness	• Report summarizing evaluation of the need for training, and assignment or recruitment of additional E&S experts • Staff trained on ESHSRIM manual • Evidence of application of ESHS management systems in all projects • As required, necessary E&S ecperts asigned or recruited (to be determined by MoEMEH/PMU)
3.	Capacity building to develop and streamline the ESHS processes and procedures with lead ESHS agencies in line with National Energy Policy (NPE 2015–2030)	Environmental and Social Systems	MoEMEHMEH/JIRAMA/ADER/Lead ESHS agencies	Recurrent	Continuous	• EIA Environmental and Social permitting procedures streamlined to include Health and Safety and Social safeguards specialist review by lead agencies • Training and coordination Plan for EIA permitting of lead ESHS agencies • Number of trainings and technical assistance provided to relevant ESHS agencies on ESIA processes and procedures

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						• Training reports • Evidence of application of ESHS management systems in all projects
4.	MEH to develop and manage Preparation and implementation of POM with relevant E&S Guidelines, including functional GRM structures at all subproject levels, guidelines on hazardous and non-hazardous waste management	Environmental and Social Systems	MMEHEH, PMU and Implemening agencies	Other	Before commencement of sub-projects	• GRM constituted and grievances being logged, responded, and resolved for sub-project levels • Confirmed annually through APA
5.	Include a robust ESHS risks and impacts management verification protocol and include in Annual Performance Assessment (APA)	Environmental and Social SystemsS	ONE / WB MEH, PMU and Implemening agencies	Other	Before APA Annually	• Inclusion of APA verification indictors indicators in the ToRs for APA • Inclusion of a chapter on ESHS in the main APA reports
6.	PCT to cConduct an independent annual ESHS audit for all infrastructure investments, and reports shared with the WB	Environmental and Social SystemsS	ONE / WBPMU, Independent auditor	Other	Annually	• Independent Annual ESHS Audit report
7.	Include adequate supervision and monitoring budgets	Environmental and Social Systems	MEHoE/PMU	Other	Prior to procurement of any civil works	• Bidding and Contract document includes ESHS aspects.

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	and all the applicable ESHS clauses and in the bidding and contract documents for civil works					• Allocation of adequate ESHS budget in bills of quantities for all subprojects • Supervision and monitoring reports and confirmed through APA
	Develop PforR project guidelines on hazardous and non-hazardous waste management, taking into account the weak infrastructure in Madagascar at all levels for SWM. Note: This will rely on a study (existing or to be undertaken) on WM in Madagascar. The sub-project PREES will indicate site options for WM. WM guidelines will include management of electronic and hazardous waste, including damaged meters, cables, transformers, solar panels, batteries, and associated packaging materials.	Environmental and Social Systems	lMEHoE/ONE	Other	Prior to procurement of any civil works	• Project WMP

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	Develop PforR project guidelines on resettlement, including sub-project criteria for when resettlement will be allowed. This could take the form of a Resettlement Policy Framework (RPF). Guidelies will include development and implementation on development and implementation of Resettlement Action Plans (RAPs). Definition of the roles for the various PforR players to be involved will be included. The gjuidelines will be in compliance with World Bank Group ESS5.	Environmental and Social Systems	MEH/etc.	Other	Prior to procurement of any civil works	• Project Resettlement Guidelines
	Promote and provide means for effective and inclusive engagement of stakeholders including monitoring the consultation process and providing feedback on the implementation of citizens' priorities. .	Possible negative sub-project impacts	MEH	Continuous	Start during screening and continue through life of sub-project	• Summaries of meetings and participation lists

	Disclose appropriate Program information on E&S risks and impacts in a timely manner to ensure meaningful consultations, in relevant local languages, in a manner that is accessible and culturally appropriate, considering any specific needs of groups that may be differentially affected by the Program, or groups of the population with specific information needs, such as disability, literacy, gender, mobility, differences in language or accessibility.	Possible negative sub-project impacts	MEH/ONE	Continuous	Start during screening and continue through life of sub-project	• Provide access to documents on MEH and World Bank websites • Develop non-technical summary for presentation at disclosure meetings with stakeholders
	Ensure adequate documentation of all stakeholder engagement process including discussions held, key concerns raised, responses given and agreed actions. Collect photographic	Possible negative sub-project impacts	MEH	Continuous	Start during screening and continue through life of sub-project	• Meeting summaries

	evidence to the extent possible. ▪					
	Support development of climate change screening tools to be integrated into the sub-projects design, monitoring and tracking of climate change related risks and proposed mitigation and/or adaptation measures.	Possible negative sub-project impacts	MEH/ONE	Continuous	Screening	• Online version of tools and guidelines for their use
	Conduct feasibility and design studies that will identify proper siting, planning and execution of the sub-projects to minimize impacts on natural habitats and PCR resources. ▪	Possible negative sub-project impacts	MEH	Continuous	Screening and sub-project design	• Study reports
	Develop an E&S screening checklist for screening sub-projects to identify any potential impacts to natural habitats and physical cultural resources before undertaking environmental assessments.	Possible negative sub-project impacts	MEH/ONE	Continuous	Screening	• Checklists

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	The Program will partner with OSH to enhance the capacity of implementing agencies on health and safety risks management based on national laws and regulations through training of ESHS staff on OHSA, 2010 and Workers Benefit Act (WBA) 2000. Develop a simplified OHS manual for contractors.	Possible negative sub-project impacts	MEH/	Other	Prior to selection of sub-projects	• Summary of any training undertaken • Guidance documents
	Explore strategies to use alternative materials instead of wooden poles, such as plastic poles	Possible negative sub-project impacts	MEH/Contractor	Continuous	During design phase of transmission and distribution line sub-projects	• Sub-project feasibility report

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1 Program Description

1.1 ackground

1. **Demographics and social pressures.** Madagascar's population is estimated at 32 million in 2025, growing at 2.4 percent annually. The demographic profile is predominantly young, with two thirds under the age of 30. This creates both opportunities for inclusive growth and significant pressures on employment, service delivery, and social stability.

2. **Macroeconomic fragility.** The economy has shown signs of recovery following the COVID 19 pandemic and global inflationary shocks, with real GDP growth projected at 4.0 percent in 2025. Growth remains constrained by infrastructure bottlenecks, weak productivity, and vulnerability to external shocks. Inflation is elevated at 8.5 percent, the current account deficit widened to 5.8 percent of GDP, and the fiscal deficit is projected at 5.9 percent. Public debt has risen to 57.3 percent of GDP. Fiscal risks are compounded by the structural deficits of JIRAMA, the vertically integrated state-owned electricity and water utility company, whose operational gap alone accounted for more than 1.5 percent of GDP in 2023.

3. **Public mobilization and political transition.** Energy insecurity and institutional fragility have led to frequent electricity and water outages, particularly in urban centers. JIRAMA has struggled to meet demand, prompting rotating blackouts in major cities. This deterioration in essential services catalyzed widespread public mobilization, beginning in September 2025 with youth led protests (GEN-Z) demanding universal access to water and electricity, structural reform of the energy sector, and greater social equity. With over 70 percent of the population lacking reliable electricity and more than 75 percent living below the poverty line, the inability to ensure basic service delivery led to a change in leadership and the establishment of a transitional government.

4. **Reform momentum.** The new administration has committed urgent reforms to stabilize service delivery and restore public confidence. The World Bank's Development Policy Operation supports measures to restore macroeconomic stability, enhance public financial management, and unlock private sector growth. Key steps include adoption of a new electricity regulatory framework, operationalization of the Autorité de Régulation de l'Électricité (ARELEC), and implementation of a revised tariff methodology. The Country Climate and Development Report (2024) identifies renewable energy expansion as a lever for climate resilient growth.

5. **Regional integration and partnerships.** Madagascar's membership in the Southern African Development Community (SADC) and the Common Market for Eastern and Southern Africa (COMESA) anchors its regional development agenda. The 45th SADC Summit, hosted in Antananarivo in August 2025, reaffirmed support for Mission 300 and regional electrification. Through COMESA and the Eastern and Southern African Trade and Development Bank, Madagascar benefits from regional energy planning, cross border infrastructure initiatives, and financing for renewable energy and digital connectivity.

1.2 Sectoral (or multi-sectoral) and Institutional Context of the Program

6. Home to about half a billion of Africa's people, Eastern and Southern Africa is a geographically, culturally and economically diverse region of 26 countries stretching from the Red Sea in the North to the Cape of Good Hope in the South. Children under 18 make up almost half of the total population. The subregion boasts of some of the world's richest human and natural resources and, apart from South Africa, the countries are predominantly raw material exporters. The World Bank is a dedicated partner for Eastern and Southern African countries, helping them deliver strong development outcomes for their people. A brighter future for Africa is a better future for the world.

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7. The World Bank is assisting the government with policy reforms to attract investments in generation and renewable energy along with the promotion of the regional energy trade in the Eastern Africa Power Pool (EAPP), modernizing the electricity network for the needs of a modern economy and increasing energy access are among the key areas of the Bank's deepening engagement in the sector. To accelerate the access to modern and affordable Energy services, the World Bank and the African Development Bank (AfDB) have launched the Mission 300 initiative, aiming at providing electricity access to 300 million people in Sub-Saharan Africa by 2030.

1. 8. The target was announced jointly by President Banga of the WBG, and President Adesina of the AfDB at the Spring Meetings in April 2024, with the WBG committing to delivering electricity access to 250 million people in Sub-Saharan Africa, with African Development Bank adding 50 million people. The initiative was fully endorsed by African Heads of State at the Mission 300 Africa Energy Summit held in Dar es Salaam in January 2025.

2. 9. In the AFE region, the target is primarily supported by the Accelerating Sustainable and Clean Energy Access Transformation (ASCENT) Program, using a Multi-Phase Approach (MPA). ASCENT is an ambitious multi-billion program aimed at providing clean energy access to 100 million people across up to 20 countries in Eastern and Southern Africa, approved in November 2023 with an IDA envelope of US$5 billion. While the focus is on electricity access, the program will also leverage synergies with clean cooking to accelerate adoption of clean cooking solutions in the region. The Program will also employ cross-sectoral approaches to electrify productive uses and important social infrastructure, such as schools and health facilities. This is done through a combination of mutually reinforcing country projects and regional platforms

3. 10. An estimated thirty-six percent of the population of Madagascar has access to electricity, among the lowest in Sub-Saharan Africa and in the world. Under Mission 300 Energy the Government is committed to ensuring access to reliable, affordable and sustainable electricity to 80 percent of the population by 2030.

4. 11. JIRAMA's operational performance is strained by very high losses (about 30% in electricity and 45% in water) driven by aging networks, inadequate maintenance, theft, and fraud, which degrade service quality and contribute to frequent outages. The generation mix remains heavily thermal, and fuel costs are dominant; in 2023, fuel accounted for over half of operating expenses and even exceeded total revenues. Financially, the company's monthly revenues in 2023 averaged roughly 83 billion Ariary against expenses of around 170 billion Ariary, yielding a deficit of about 90 billion Ariary per month (around 1,080 billion Ariary on an annualized basis) and necessitating substantial state transfers. As of end-2023, total debt and arrears exceeded 1,439 billion Ariary, with large obligations to private suppliers and IPPs. Tariffs remain below cost-recovery: in 2024, JIRAMA's average selling price was about 631 Ar/kWh versus an average production cost near 729 Ar/kWh, entrenching the structural gap. The main deficit drivers include high fuel-dependent operating costs, elevated technical and commercial losses, weak revenue collection, legacy contractual burdens, and governance and operational inefficiencies.

5. The institutional structure for energy sector development is composed of four main entities: the Ministry of Energy and Hydrocarbons (MEH), the regulator (ARELEC), the rural electrification agency (ADER), and JIRAMA. MEH sets government policy, provides strategic coordination of the energy sector and oversees JIRAMA's activities.

13. The World Bank's ongoing energy portfolio in Madagascar includes two operations; (i) the Least-Cost Electricity Access Development project (LEAD, $161m) and ii) the Digital and Energy Connectivity for Inclusion in Madagascar project (DECIM, $375.6m). These projects remain flagship projects supporting M300 initiative in the country. Under this initiative, the Madagascar National Energy Compact was launched in January 2025 with the goal to guaranteeing access to reliable, affordable and sustainable electricity to 80% of the population by 2030 and to guaranteeing access to improved and clean cooking solutions for at least half (50 %) of the population by 2030. The implementation of these projects supports grid and off-grid electrification, technical assistance, and

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sector reforms focusing on new connections, network extension, and operational improvements. In addition to the investments projects, the World Bank is also supporting the government and the electric utility JIRAMA, under the ongoing Development Policy Financing series, to implement necessary reforms that will maintain the reform trajectory of JIRAMA to ensure its financial viability and encourage private sector participation to unlock additional resources. The ambition of the Energy compact is to increase the share of renewable energies to at least 85% by 2030 with support from the private sector.

1.3 Government's program

6. The Madagascar M300 Energy Compact 2025-2030: Madagascar adopted a National Energy compact, aligned with the United Nations Sustainable Development Goal 7 (SDG7), that serves as a roadmap to accelerate access for all, while ensuring affordable, reliable, inclusive, sustainable and clean energy for the Malagasy people. The Malagasy Government is committed to guaranteeing access to reliable, affordable and sustainable electricity to 80% of the population by 2030 and to guaranteeing access to improved and clean cooking solutions for at least half (50 %) of the population by 2030. In terms of access to electricity, this would represent an increase of 44% compared to the current access level of 36%, an average annual gain of 2.2 million people per year, of which approximately 0.4 million would gain access through JIRAMA and 1.8 million through private sector mini-grids and solar home systems. When it comes to cooking, around 4.1 million people, or 14% of the population, today have access to improved or clean cooking technologies. To achieve this ambitious objective of 50%, exponential growth would therefore be required; it would be driven by significant investments from the private sector, which would allow 8.6 million people to have access to it in 2026, increasing to 12.4 million in 2028 and almost 18 million in 2030.

7. The Compact constitutes the overall Government program supported by the PforR ASCENT program and provides a unified framework for accelerating access to electricity and clean cooking, strengthening sector planning, modernizing regulation, and mobilizing large scale private investment. It outlines a required investment envelope of US$7.2 billion by 2030, with an indicative contribution pattern of 10% Government resources, 30% development partners, and 60% private sector finance. To operationalize this vision, the Compact mandates the preparation of an integrated electrification strategy and national access plan by 2026, the deployment of full MTF surveys in 2026 and 2029, establishment of a dedicated Compact Delivery and Monitoring Unit (CDMU) within MEH and the Presidency, and the adoption of harmonized, light touch regulatory frameworks for mini-grids, off-grid solar, and clean cooking. It also calls for scaling Results Based Financing (RBF) mechanisms for all energy access technologies (including DRE, improved and clean cooking, and electrification of public institutions) to unlock the required levels of private capital.

8. The Compact is aligned with the National Energy Policy (NPE 2015–2030), which prioritizes renewable energy development, competitive least cost planning, and universal access. It further builds on sector diagnostics, including the Geospatial Least Cost Electrification Plan (GLCEP), the updated Least Cost Development Plan (PDMC), and the Integrated Energy Access Plan (PEI). By consolidating policy, regulatory, and planning reforms under a single results-oriented framework, the Compact ensures coherence across on grid, mini grid, off grid, and clean-cooking strategies, and clarifies the roles of MEH, ARELEC/ORE, ADER, and JIRAMA in delivering the access agenda.

9. The Compact also emphasizes the need for JIRAMA financial and operational recovery. This is translated into the JIRAMA Recovery Plan (PRJ) adopted in June 2025, which targets are embedded within its Pillar V ("Ensuring financially viable public services"). The PRJ focuses on strengthening governance, improving operational performance, and restoring financial viability. Key commitments include publication of audited financial statements, modernization of tariff methodologies and indexation, systematic reduction of arrears, strengthening collections (targeting ≥90% by 2030), loss reduction, and the accelerated hybridization of isolated centers to reduce fuel dependency. These commitments are essential to improving JIRAMA's creditworthiness, reducing fiscal risks, and enabling private sector participation in generation and distribution.

10. Together, the Madagascar M300 Energy Compact and its embedded utility reform plan constitute the full boundary of the Government program supported by ASCENT Madagascar PforR. The PforR will therefore focus

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on increasing access through grid and DRE solutions, improving JIRAMA's financial viability, strengthening governance, accelerating clean cooking adoption, and supporting the enabling conditions required to deliver 2030 access targets.

11. The ASCENT MPA results chain recognizes that access to energy contributes to outcomes at multiple levels. At the community and national level, it creates economic opportunities, enhances access to human development services and health and education outcomes, enables the digital economy, and improves quality of life and resilience. At the regional level, it increases demand for grid supply or private-sector companies' demand for supply of DRE solutions, delivering economies of scale and attracting private capital. At the global level, it contributes to climate change mitigation, as well as adaptation through improving pandemic and disaster preparedness and reducing causes of fragility

1.4 Program Development Objective

12. The ASCENT Madagascar Program Development Objective (PDO) is to improve financial and operational performance of JIRAMA and increase access to sustainable and clean energy in Madagascar.

1.5 PDO Level Results Indicators

13. The ASCENT MPA results chain recognizes that access to energy contributes to outcomes at multiple levels. At the community and national level, it creates economic opportunities, enhances access to human development services and health and education outcomes, enables the digital economy, and improves quality of life and resilience. At the regional level, it increases demand for grid supply or private-sector companies' demand for supply of DRE solutions, delivering economies of scale and attracting private capital. At the global level, it contributes to climate change mitigation, as well as adaptation through improving pandemic and disaster preparedness and reducing causes of fragility. The program aims to expand both electricity and clean cooking access, with electricity access being the primary target.

14. The Program Development Objective (PrDO), to which participating countries and regional institutions will contribute, is to increase access to sustainable and clean energy in Eastern and Southern African countries. Access to energy includes on-grid and off-grid (DRE) electricity solutions and clean cooking. Sustainability primarily refers to the importance of enhanced regional electricity trade to enable sufficiency of electricity supply and financially viable, private sector delivery models. Clean energy refers to the increased use of DRE and the associated climate-change mitigation benefits. The PrDO will be monitored by measuring progress on three outcomes. Each phase under the program will contribute to one or more PrDO, as appropriate, and will also add relevant intermediate indicators, including renewable energy capacity installed or enabled, and private capital enabled or mobilized towards achieving the outcomes of providing people with electricity and reducing greenhouse gas emissions.

15. The PDO Level Results indicators are:

- PDO Indicator 1: People provided with direct access to electricity through new connections (Number of people)
- PDO Indicator 2: People provided with clean and improved cooking solutions (Number of people)
- PDO Indicator 3: Reduction in JIRAMA's operational and financial deficit (%)

1.6 ASCENT Madagascar Program for Results (PforR) Description

16. The government objective for this program is to guarantee access to reliable, affordable and sustainable electricity to 80% of the population by 2030 and access to improved clean cooking solutions for at least half (50 %) of the population by 2030. Within this broad goal, the specific objectives of the PforR financing is to improve

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financial and operational performance of JIRAMA and increase access to sustainable and clean energy in Madagascar.

17. The PforR results areas are as follows:
    1. Increased access to electricity (on-grid);
    2. Improved utility financial viability/performance (revenue increase, debt and arrears payment);
    3. Improved utility governance and management;
    4. Expanded Energy Access through Decentralized Renewable Energy (DRE);
    5. Deployment of Clean and Improved Cooking Solutions.

Details are provided in the following sections.

Result Area 1 (RA1): Increased access to electricity (on-grid)

18. This Result Area focuses on expanding reliable electricity access by (i) connecting more households and companies to the existing interconnected grid and isolated centers; (ii) by supporting state-owned renewable energy projects for the hybridization of isolated centers[2] with with an overall limit of 'substantial' E&S risks and 3 (but not requiring an ESIA) - high risk sub-projects will be excluded; and (iii) by reinforcing distribution grid infrastructure. For isolated centers, priority will be given to small, remote JIRAMA centers that lack private sector appeal due to their limited size, high operating costs, and low revenue potential. In these areas, private concessions would require prohibitively high tariffs under Power Purchase Agreements (PPAs), making electricity unaffordable for rural and marginalized populations. Public intervention is therefore essential to ensure equitable access and prevent deepening energy poverty.

19. Increasing generation capacity is critical to unlocking access. The main constraint preventing JIRAMA from connecting new customers is not only the absence of networks, but also the severe shortage of production capacity. Many isolated centers operate at or near full load, forcing JIRAMA to maintain waiting lists of households and institutions that cannot be served. Without additional generation, grid densification alone will not translate into new connections, underscoring the need for generation and access expansion to proceed in parallel.

20. [4] with solar PV and battery storage will reduce reliance on costly thermal generation, which currently drives JIRAMA's structural deficit (fuel accounts for over 50% of operating costs). By lowering production costs and improving reliability, these investments will enable JIRAMA to connect thousands of households and public facilities that have been waiting for years, while reducing outages that undermine economic activity and social services. Furthermore, increasing generation capacity is indispensable for achieving Mission 300 targets:

2 An isolated center is a localized electricity supply system that is not connected to the interconnected grid and operates independently, typically serving remote or rural areas.

3 Defined as follows: risks are mostly temporary, predictable and/or reversible, and the nature of the sub-project does not preclude the possibility of avoiding or reversing them; adverse E&S impacts and associated mitigation measures may give rise to a limited degree of social conflict, harm or risks to human security; the risks are medium in magnitude or lower and/or in spatial extent; the potential for cumulative and/or transboundary impacts may exist, but are less sever and more readily avoided or mitigated than for High RIsk activities; and there is medium to low probability of serious adverse effects to human health and/or the environment, and there are known and reliable mechanisms available to prrevent or minimize any incidents.

4 Hybridization is the integration of two or more energy sources—typically renewable (such as solar) and conventional (such as diesel or HFO Heavy Fuel Oil)—within the same power system to improve reliability, reduce fuel use, and lower operating costs.

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delivering 700,000 new on-grid connections by 2030 and raising renewable energy's share to 85%. Without this dual approach: generation plus access, the National Energy Compact's goals cannot be met.

21. Beyond access, hybridization enhances resilience to climate shocks and fuel price volatility, while creating conditions for future private sector participation under a more sustainable cost structure. These interventions will deliver transformative impacts: reducing fiscal pressure, improving service quality, and enabling inclusive growth in underserved regions.

22. Building on the critical expansion of generation capacity, an essential prerequisite for unlocking new connections, JIRAMA will further extend grid-based access to households, public institutions, businesses, and other productive use consumers across urban, peri urban, and rural areas, in line with the access targets set out in the PRJ and the Energy Compact.

Result Area 2 (RA2): Improved utility financial viability/performance

23. Result Area 2 will focus primarily on revenue increase, debt and arrears payment. It will support implementation of concrete, measurable cash discipline and arrears clearance framework through various DLIs. Each DLI specifies what must happen, when, and how it will be verified, ensuring predictable transfers, timely settlement of current bills, systematic reduction of legacy arrears, and sustained improvements in cash conversion.

24. MEF will execute the approved annual transfer schedule in full and on time. Disbursement against this DLI requires that 100% of scheduled transfers are credited to JIRAMA's account by the last business day of each period. This mechanism provides transparency and cashflow predictability consistent with the equilibrium subsidy coverage and payment operations already defined by the Government.

25. JIRAMA will pay 100% of current (post cutoff) invoices to fuel suppliers and IPPs within their contractual due dates. The quarterly target is a zero overdue balance on current invoices at each reporting cutoff. This DLI safeguards supply continuity and rebuilds the payment track record required to crowd in private investment.

26. Government and JIRAMA will implement the arrears clearance plan through: (i) factoring with discount (suppliers pay now; State/JIRAMA service the resulting obligation), and/or (ii) direct long-term repayment (five-year tenor with one year grace). The financial burden follows the agreed 96% (State) / 4% (JIRAMA) split. The quarterly target equals or exceeds the published glidepath for each creditor cohort, with the remaining stock declining accordingly through program implementation.

27. JIRAMA will also achieve annual EBITDA improvement targets consistent with the financial trajectory set out in his Recovery Plan. EBITDA will be calculated based on agreed accounting policies and will serve as a key indicator of enhanced operational performance, improved cost efficiency, and progress toward long term financial viability.

28. The discipline in implementing the financial viability measures under Result Area 2 is essential for strengthening the bankability of JIRAMA. Consistent progress on predictable cash inflows, timely payment of current bills, and a credible, independently verifiable arrears reduction path significantly reduces payment risk for private investments under PPAs. This creates favorable conditions for institutions such as MIGA, and potential Partial Risk Guarantees to be deployed more efficiently and at scale across the renewable energy project pipeline. In turn, this improved risk environment supports faster financial close and contributes to more affordable tariffs over time.

Result Area 3 (RA3): Improved utility governance and management

29. This Result Area focuses on strengthening JIRAMA's governance and institutional capacity to ensure accountability, transparency, and long-term sustainability of reforms. Governance weaknesses have historically undermined JIRAMA's credibility and investor confidence: audit reports through 2023 carried disclaimers or adverse opinions, reflecting serious internal control deficiencies; HR imbalances (overstaffing and low female participation at 14%) and inefficient procurement processes have further constrained performance. Addressing these gaps is essential to embed accountability and modern management practices.

30. Under ASCENT Mada, progress will be measured through Governance improvement metrics for transparency and performance. Key actions include:

- Appointment of Deputy CEOs and functional restructuring
- Establishment of a Board of Directors and Recovery Committee or an equivalent structure

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- Signing and implementation of performance contracts for senior management, linking incentives to measurable targets such as loss reduction and collection improvement.
- Audit review and publication of annual audited financial statements and quarterly performance reports, ensuring transparency and compliance with international standards.
- Reinforcement of internal audit functions and adoption of updated procedures manuals, alongside modernization of procurement processes validated by the Council of Ministers.
- Human resources reforms to optimize staffing levels, while avoiding overstaffing, and improve gender balance.
- Development of a strategy for managing isolated centers, including options for private sector participation, and enabling JIRAMA to directly execute sectoral investments through targeted budget transfers.

31. By embedding these governance reforms, ASCENT Madagascar will restore confidence among consumers, partners, and investors, reduce operational risks, and create the institutional foundation for sustainable sector performance.

32. This PforR project should result in improved institutional E&S management systems at JIRAMA and other government stakeholders who will be involved in oversight or management of project activities. This should include the following:

- Improved ESHS screening of potential PforR activities (sub-projects);
- Improved oversight (including monitoring) of ESHS performance during all phases of sub-projects;
- Establishment of a grievance redress mechanism (GRM) that will be accessible to sub-project workers, the public, and any project-affected persons (PAPs) or groups in relation to any required resettlement. Special consideration should be given to vulnerable persons or groups and victims of GBV and SEA/SH;
- Develop a PforR-wide waste management plan that takes into consideration the current weak hazardous and non-hazardous waste management infrastructure in many parts of Madagascar;
- Training of government and other stakeholders in E&S management principles.

Result Area 4 (RA4): Expanded Energy Access through Decentralized Renewable Energy (DRE)

33. Result Area 4 supports rural electrification, mini-grids, standalone solar, Productive Use of Renewable Energy (PURE) systems, and electrification of public institutions. This in turn will support the scale up of decentralized renewable energy (DRE) solutions, a core pillar of the Government's M300 Energy Compact, which anticipates that 80% of all new electricity access by 2030 will come from off grid and mini-grids systems. While JIRAMA remains critical for on grid expansion, vast rural and remote communities cannot be reached affordably or rapidly through grid extension alone. This Result area therefore supports ADER's (Rural Electrification Agency) efforts to accelerate energy access in underserved areas by incentivizing private sector–driven deployment of mini-grids, standalone solar systems, and PURE solutions through a structured Results Based Financing (RBF) mechanism.

34. This Result Area also addresses persistent barriers, including high upfront capital costs, limited affordability among rural households, and financing constraints for operators, through a blended financing architecture that combines viability gap funding, performance-based payments for verified new connections, and access to credit lines or risk sharing instruments. Competitive processes will ensure cost effective pricing, adherence to quality standards, and inclusion of poorer districts. Targeted end user subsidies will help overcome affordability constraints and ensure equitable access.

35. Result Area 4 supports the electrification of priority public institutions, including schools, health centers, and administrative facilities, through long term service contracts with private providers for installation, operation, and maintenance of solar PV systems with storage. This intervention strengthens human capital outcomes, enhances delivery of health and education services, and complements national efforts to improve resilience and institutional functioning in underserved regions.

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36. Collectively, this Result area will catalyze private investment, expand reliable electricity access in rural and remote areas, foster productive uses that enhance incomes, and reduce the reliance on fossil fuel–based generation. It will contribute directly to the PDO by increasing access to clean and sustainable energy while supporting local economic development.

Result Area 5 (RA5): Deployment of Clean and Improved Cooking Solutions

37. Result Area 5 contributes to the Government's objective of raising access to clean and improved cooking solutions from 14% in 2022 to 50% by 2030, as articulated in the M300 Energy Compact. Madagascar faces one of the lowest clean cooking access rates globally, with over 85% of households still relying on biomass, imposing significant health, environmental, and economic burdens, especially on women and children. RA5 addresses this challenge by incentivizing large-scale market expansion and adoption of clean and improved cooking technologies.

38. This Result Area supports MEH efforts to expand dissemination of clean cooking solutions including a Results Based Financing mechanism that rewards the verified deployment of quality assured clean cooking equipment, including improved biomass stoves, LPG solutions, ethanol stoves, and emerging electric cooking technologies where feasible. The RBF mechanism, combined with targeted consumer incentives, lowers retail prices, strengthens last mile distribution networks, and encourages private sector scaling. Behavior change and awareness campaigns will further promote sustained adoption, emphasizing health benefits, reduced time spent collecting firewood, and lower household energy costs.

39. By structuring support around verified results, Result Area 5 promotes market transformation rather than direct procurement. It improves affordability for low-income households, supports the emergence of local manufacturing and distribution networks, and helps reduce deforestation and greenhouse gas emissions. The Result Area also integrates gender responsive measures, acknowledging that women bear the largest burden of traditional cooking practices and stand to benefit disproportionately from safer, cleaner, and more efficient alternatives.

40. Through this Result Area, ASCENT Madagascar will deliver significant development and climate co benefits, contributing directly to the PDO by increasing access to clean energy services and improving health, environmental sustainability, and household welfare.

41. The Disbursement Linked Indicators (DLIs) for each of the five Result Areas are provided in (Table...) below.

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Table 1-1: PforR Result Areas: Disbursement Linked Indicators (DLIs) and Proposed Allocations

Results Areas	Proposed DLIs and Components	Indicative Allocations	To/By
RA 1: Increased access to electricity (on-grid)	**DLI 1:** Number of JIRAMA isolated centers hybridized with renewable energy commissioned	$15,000,000	JIRAMA
	DLI 2: Number of new On-grid connections provided	$45,000,000	JIRAMA
	Sub-total 1	**$60,000,000**	
RA 2: Improved utility financial viability/performance (revenue increase, debt and arrears payment)	**DLI 3**: Amount budgeted and quarterly transferred to JIRAMA for operational subsidies (MEF)	$40,000,000	MEF
	DLI 4: Timely payment by JIRAMA of current invoices	$4,000,000	JIRAMA
	DLI 5: Annual amount paid for JIRAMA debt and arrears (by MEF and JIRAMA)	$37,000,000	MEF (96%) JIRAMA (4%)
	DLI 6: Increased EBITDA (Amount from Year N-1 audited financial statement, in billion MGA)	$4,000,000	JIRAMA
	Sub-total 2	**$85,000,000**	
RA 3: Improved utility governance and management	**DLI 7**: JIRAMA senior management appointed, and transparency/ performance improved (Deputy CEOs Appointed, performance contracts signed and, Audited Financial statement published)	$5,000,000	MEF
	Sub-total 3	**$5,000,000**	
RA 4: Expanding Energy access through Decentralized Renewable Energy (DRE): rural electrification, clean cooking solutions, PURE, and stand-alone PV projects	**DLI 8:** Number of new off-grid connections provided	$50,000,000	ADER/FNED
	DLI 9: FNED decree adopted, Management contract signed with Fund manager competitively recruited and Operation manual approved	$5,000,000	ADER/FNED

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RA 5: Deployment of clean and improved cooking equipment	**DLI 10:** Number of clean and improved cooking equipment deployed	$25,000,000	MEH
	Sub-total 4	**$80,000,000**	
	1.2: Job creation and incubation: training and professional inclusion, catalytic grants	$5,000,000	
	1.3: Project coordination and support to implementation	$10,000,000	
	Sub-total 5	**$20,000,000**	

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1.7 Institutional and Implementation Arrangements

42. The PforR will rely on Madagascar's national environmental and social management systems, including relevant laws, regulations, and institutional arrangements. As part of project preparation, the Bank team is carryiedng out this **Environmental and Social System Assessment** (ESSA) for the proposed Program activities in Madagascar in order to examine existing environmental and social management systems within the power sector. The ESSA wais undertaken to confirm consistency with the six core PforR principles outlined in paragraph 9 of the "World Bank Policy for Program-for-Results Financing" in order to effectively manage Program risks and promote sustainable development. The Assessment considers existing regulations and policies, their legal and practical applicability at the program level, institutional capacity, and the effectiveness of implementation in practice. In addition, the ESSA assesses management capacity with regard to (a) distributional equity, affordability and gender constraints; (b) consultation processes; and (c) risk of creating or exacerbating conflicts. The findings of the ESSA are factored into the overall integrated risk assessment.

43. The institutional structure for energy sector development in Madagascar is composed of four main entities: the Ministry of Energy and Hydrocarbons (MEH), the regulator (ARELEC), the Rural electrification agency (ADER), and JIRAMA (see Figure 1-1 below). MEH sets government policy, provides strategic coordination of the energy sector and oversees JIRAMA's activities. These and other relevant government stakeholders in the areas relevant

1.8 Results Monitoring, Evaluation, and Verification Agencies

44. MEH will be responsible for results monitoring and reporting of this PforR program. The MEH's environmental unit (Cellule Environnementale, or 'CE') provides guidance and monitoring for Category B investment projects in accordance with the MECIE Decree, following screening by the ONE. At the request of the MEH or investors, the MEH's CE may also provide support in public consultations. The MEH EC plays a coordinating, interface and technical support role in the implementation of the MECIE Decree, working closely with the ONE, developers and local authorities. It ensures the effective integration of environmental and social requirements from the design stage of projects and ensures that the commitments contained in the PREE or Environmental and Social Commitment Program (Programme d'Engagement Environnemental et Social, or 'PREES'), Environmental Specifications and Environmental Compliance Orders are translated into coherent, realistic action plans that comply with national regulations.

45. The MEH, through the IPF part of ASCENT Madagascar, will recruit an Independent Verification Agency (IVA) to verify the achievement of the DLIs using terms of reference satisfactory to the World Bank. The DLIs will be verified based on review of official data and reports supplementing evidence-based methods. The periodic IVA reports will serve as the basis for assessing progress toward achievement of the DLI targets and for disbursement authorization by the World Bank.

1.9 Disbursement Arrangements

46. The Program disbursements will be based on achieved results. The supporting documents for accountability of Bank funds will be the certificate of completion issued by the IVA for the achievement (or partial achievement) of DLIs.

47. Program Operational Manual (POM): Preparation of the POM will be an effectiveness condition and will include: (a) the activities and timetable of actions to be carried out under the Program; (b) excluded activities; (c) the respective roles and responsibilities of entities participating in the Program; (d) the composition and responsibilities of the Program Implementation Team; I the fiduciary, technical and operational aspects and procedures for implementation of the Program, including the financial management procedures; (f) the procedures for distribution of IDA grant proceeds; (g) the verification protocols for the DLIs and DLRs; (h) the Anti-

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Corruption Guidelines; and (i) the Program Action Plan. The POM will also include guidelines for implementation of ESHS aspects under the Program.

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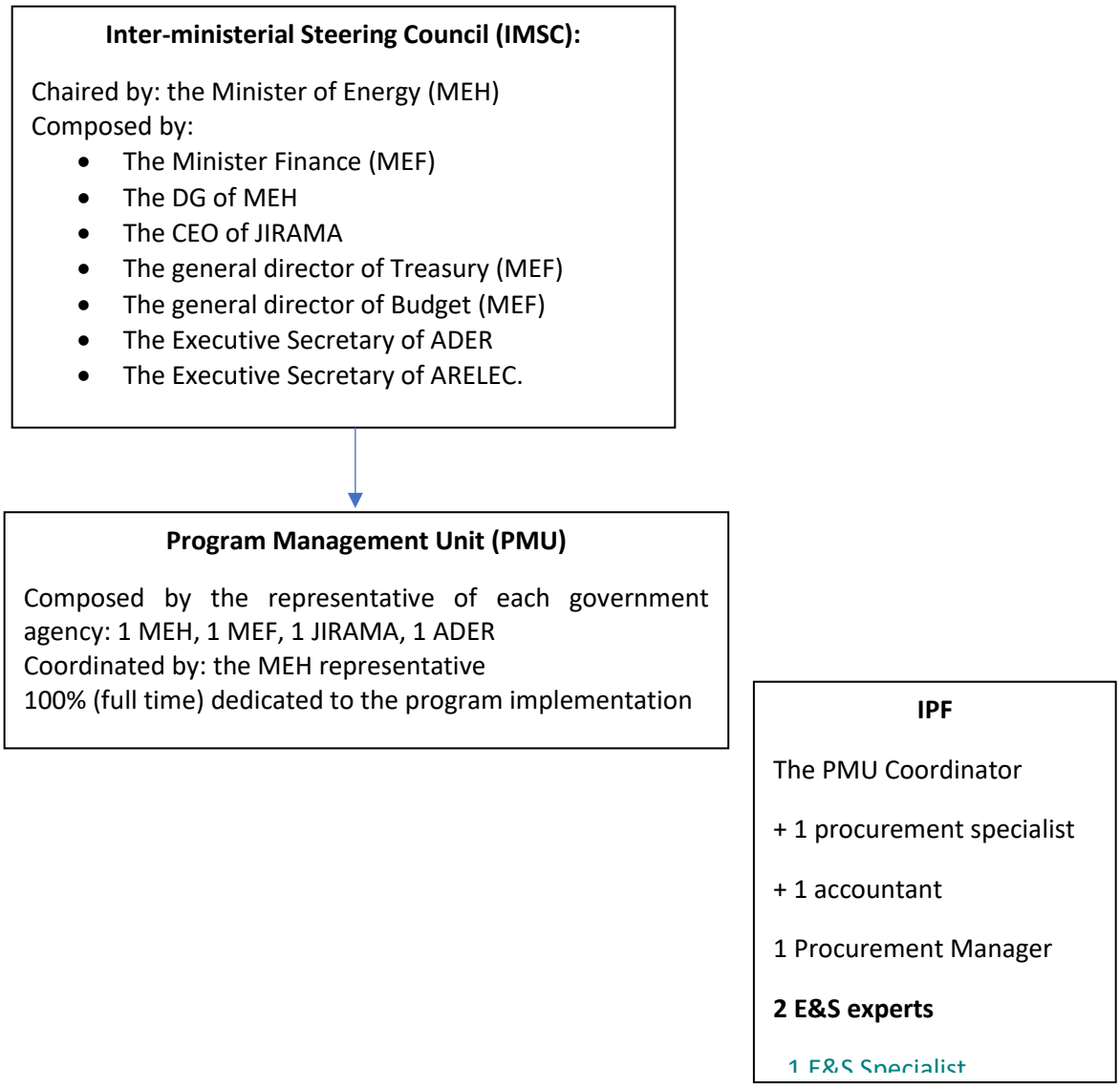
Figure 1-1 Implementation Arrangements for the PforR and IPF



Source: World Bank ASCENT PAD

2 Environmental and Social Systems Assessment Scope and Methodology

2.1 Purpose and Objectives

48. The PforR instrument requires technical, fiduciary, environment and social assessments. Therefore, the ESSA has been prepared by the WB to determine the capacity of the borrower's systems to plan and implement effective measures for the management of ESHS risks associated with the Program, and to promote E&S sustainability and requirement to avoid, minimize, or mitigate adverse ESHS impacts. In accordance with the WB

PforR policy requirements, the borrower will apply national systems for the management of ESHS risks associated with the PforR interventions, provided these are consistent with the WB's PforR policy requirements, including the six PforR Core Principles and key planning elements.

49. The specific objectives of the ESSA are to:

(i) Identify the Program's potential ESHS effects;
(ii) Review the existing policy, legal, regulatory, and institutional frameworks relevant to ESHS management of effects related to Program's interventions;
(iii) Assess the capacity of implementing institutions in managing potential adverse ESHS risks and impacts associated with the Program;
(iv) Assess the Program's system performance with respect to the Six Core PforR principles and identify strengths, weaknesses, opportunities, and threats in Program performance; and
(v) Recommend specific actions to address gaps in the Program's ESHS systems that will be embedded into the PAP and Program design, to strengthen the Program's performance.

2.2 The ESSA Approach

50. The Program's ESSA has been prepared to establish the extent to which the borrower system is consistent with the Six Core Principles of the World Bank's PforR policy for purposes of enhancing effectiveness in the management of the Program Environmental, Social Health and Safety (ESHS) effects while promoting sustainable development. These six Core Principles include:

i. **Environment and Social Management:** To promote E&S sustainability in the Program design; avoid, minimize, or mitigate adverse impacts; and promote informed decision-making relating to the Program's E&S effects.
ii. **Natural Habitats and Physical and Cultural Resources:** To avoid, minimize, or mitigate adverse impacts and promote informed decision-making relating to a Program's E&S effects in relation to physical and cultural Resources.
iii. **Public and Worker Safety**: To protect public and worker safety against the potential risks associated with construction and/or operations of facilities or other operational practices under the Program; exposure to toxic chemicals, hazardous wastes, and other dangerous materials under the Program; and reconstruction or rehabilitation of infrastructure located in areas prone to natural hazards.
iv. **Land Acquisition:** To manage land acquisition and loss of access to natural resources in a way that avoids or minimizes displacement, and assists the affected people in improving, or at the minimum restoring, their livelihoods and living standards.
v. **Indigenous Peoples and Vulnerable Groups:** To give due consideration to the cultural appropriateness of, and equitable access to, Program benefits, giving special attention to the rights and interests of the Indigenous Peoples and to the needs or concerns of vulnerable groups. 5
vi. **Social Conflict:** To avoid exacerbating social conflict, especially in fragile states, post-conflict areas, or areas subject to territorial dispute.

51. The relevance and applicability of the Six Core PforR Principles to the proposed Program are discussed under Chapter 7 where a comparative analysis of the borrower ESHS system and the Six Core PforR principles including the key planning elements is presented.

2.3 The ESSA Methodology

52. In conducting the ESSA, the WB team applied various techniques, including the following:

5 Madagascar has no IP under ESF classification. This ESSA only considers vulnerable groups.

i. **Assessment of the ESHS effects of the Program**: an ESHS risk screening of the proposed Program activities was undertaken during the concept stage to identify potential ESHS effects and to confirm that there are no Program activities that meet the defined exclusion criteria are included in the Program, in line with the World Bank guidelines for PforR.

ii. **Comprehensive desk review** of the existing national system consisting of policies, legal, regulatory and institutional frameworks, Program documents, and similar ESSAs carried out in the recent past. The review examined the set of applicable national level policy, legal, regulatory and institutional frameworks that are relevant for the management of ESHS effects in the Energy sector. In addition, the assessment examined technical documents from previous and ongoing WB PforR Programs such as the ???.

iii. **Stakeholder consultations:** In February 2026 various key Stakeholders were engaged to enable the World Bank to understand the existing systems and institutional experiences with regard to the application of the ESHS systems for the management of ESHS effects. To this end, the ESSA process involved institutional analysis to assess the capacity of key institutions to effectively implement the required ESHS actions. The assessment of these key institutions focused on their capacity for E&S risk management, public and worker safety, labour related issues and inclusion of vulnerable groups including the women, youth, and persons with disability. Some of the key relevant stakeholders consulted included Ministry of Energy and Hydrocarbons (MEH), the regulator (ARELEC), the Rural electrification agency (ADER), JIRAMA, Ministère de l'Aménagement du Territoire et des Services Fonciers, Ministère du Travail, de l'Emploi, de la Fonction Publique et des Lois Sociales, National Environment Office, among others. The comprehensive list of all stakeholders consulted is presented in Annex 2 of this report.

iv. **ESSA validation and disclosure workshop.** In line with the World Bank Policy for PforR financing and the World Bank's Access to Information Policy, the updated ESSA will beiswas disclosed and its findings presented to stakeholders on March 26, 2026. This report summarizes stakeholder input and feedback, and the report has been revised accordingly. The final ESSA report will be publicly disclosed ~~in-country on the relevant governmental agency??? websites and~~ on the World Bank external website prior to the Program's WB Board approval.

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3 Environmental and Social Benefits, Risks, And Impacts of the Program

3.1 Purpose of the Program and Exclusions

53. Scope of the Program and projects. The ASCENT Program will support the government on various activities that may have ESHS impacts, that is, increasing supply of and access to distributed (on grid) renewable electricity in rural areas (Result Area 1), expanding on-grid access to electricity through DRE (Result Area 4) and deployment of clean and improved home cooking equipment (Result Area 5).

Table 3-1 provides an overview of the principle RA1, RA4 and RA5 activities that are anticipated by JIRAMA and ADER with possible associated ESHS impacts.

3-1 : overview of the principle RA1, RA4 and RA5 activities that are anticipated

Activities	Details
Solar PV development by hybridization of JIRAMA isolated thermal centers	- **Equipment to be installed:** High-efficiency monocrystalline solar panels, inverters for AC/DC conversion, lithium-ion battery storage systems or other suitable technologies, SCADA/EMS systems, transformers, cabling, electrical protection devices, and infrastructure for connection to the JIRAMA grid. - **Installation activities:** Preparation and leveling of sites, installation of mounting structures for PV panels, electrical connection of panels to storage systems and existing networks, testing and commissioning of PV and hybrid installations. - **Areas concerned:** Isolated JIRAMA sites throughout the territory.
Distribution grid reinforcement and expansion	- **Equipment to be installed:** Meters (smart or prepaid) and connection kits. - **Installation activities:** Final connection of domestic and commercial subscribers. - **Areas concerned:** Antananarivo and provincial capitals.
Construction of renewable energy power plant with Independent Power Producers	Under the "Independent Power Product" scheme, all investments, operation, and maintenance of power plants are the responsibility of the independent producer. JIRAMA only purchases electricity production according to the quantities and prices of electricity, and the payment terms stipulated in the power purchase agreement (PPA). Activities are limited to small-scale, notably solar PV plants with a maximum installed capacity of 400 Kilowatt-peak, implemented for the hybridization of existing JIRAMA isolated centers. These installations are designed to complement existing systems, reduce diesel use, and improve reliability, rather than constitute new, standalone generation facilities. Solar PV plants under the Program have a small physical footprint (approximately 0.6 to 1.2 hectares, or 1.5 to 3 acres, depending on layout and technology) and are typically installed on already disturbed land, which limits additional environmental disturbance.
Installation of new connections	- **Equipment to be installed:** Meters (smart or prepaid) and connection kits. - **Installation activities:** Final connection of domestic and commercial subscribers.

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Activities	Details
	- **Areas concerned:** Antananarivo and provincial capitals.
Medium Voltage (MV) connections	- **Equipment to be installed:** MV/LV transformers and protection cells for industrial or large tertiary customers, other necessary equipment. - **Installation activities:** Installation work on HV/MV electrical networks. - **Areas concerned:** Antananarivo, Antsirabe
Three-phase connections	- **Equipment to be installed:** Three-phase meters and circuit breakers, specific connection cables for SMEs and workshops, transformers, protection boxes and disconnectors, surge arresters, and grounding devices. - **Installation activities:** Necessary connection work - **Areas concerned:** Antananarivo, Toamasina, Antsirabe, and possibly other large cities
Single-phase connections	- **Equipment to be installed:** Single-phase meters and circuit breakers, specific connection cables for low voltage, standardized and secure metering box, surge protectors, and grounding devices. - **Installation work:** necessary connection work - **Areas concerned:** All JIRAMA sites
Deployment of Productive Use of Renewable Energy (PURE) installations	- **Equipment to be installed:** Decentralized renewable energy systems, mainly solar photovoltaic (PV) panels with battery storage, including inverters, control systems, and associated LV distribution components, and where relevant MV infrastructure (typically 11–33 kV) within mini-grid configurations. - **Installation activities:** Deployment of standalone systems or mini-grid–based installations, covering system sizing for productive loads, installation of generation and storage units, electrical connections, commissioning, and establishment of operation and maintenance arrangements by private operators. - **Areas concerned:** Productive and income generating sites such as food processing units, cold storage facilities, irrigation schemes, small manufacturing workshops, and commercial service areas, primarily in rural and periurban locations targeted to stimulate local economic activity and job creation. -
Electrification of public institutions (schools, health centers, administrations)	- **Equipment to be installed:** Solar photovoltaic (PV) systems with battery storage, including inverters, charge controllers, internal wiring, and LV distribution equipment, designed to supply reliable low voltage electricity (≤1 kV) to public facilities. - **Installation activities:** Installation of standalone solar systems or connections through mini grids, including system sizing for institutional needs, installation and commissioning of PV and storage systems, and establishment of long-term operation and maintenance (O&M) arrangements under service contracts with private providers, selected through competitive processes. - **Areas concerned:** Public institutions such as schools, health centers, and administrative facilities, primarily located in rural and underserved areas, outside the scope of JIRAMA operated grid infrastructure, with the objective of improving essential public service delivery and human capital outcomes. -

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3.2 Environmental & Social Risk Rating

54.

55. The risk rating of some possible PforR sub-projects may be 'substantial' based on the following criterial:

i) they are mostly temporary, predictable and/or reversible, and the nature of the Project does not preclude the possibility of avoiding or reversing them (although substantial investment and time may be required);

ii) there are concerns that the adverse E&S impacts of the Project, and the associated mitigation measures, may give rise to a limited degree of social conflict, harm or risks to human security;

iii) they are medium in magnitude and/or in spatial extent (the geographical area and size of the population likely to be affected are medium to large);

iv) the potential for cumulative and/or transboundary impacts may exist, but they are less severe and more readily avoided or mitigated than for *High Risk* Projects; and

there is medium to low probability of serious adverse effects to human health and/or the environment (e.g., due to accidents, toxic waste disposal), and there are known and reliable mechanisms available to prevent or minimize such incidents.

56. The "Substantial" environmental and social risk rating reflects the fact that, while the Program's activities are largely small-scale and technically manageable, the ESSA identified key system gaps in environmental and social risk management, including fragmented institutional responsibilities, limited coordination capacity, weaknesses in grievance redress mechanisms, significant weaknesses in hazardous and non-hazardous waste management infrastructure, and gaps in land acquisition and social risk management frameworks. In parallel, the Program entails widespread and geographically dispersed ESHS risks—notably occupational health and safety, community safety, waste and e-waste management, and inclusion of vulnerable groups—which, in the current capacity context, require strengthened oversight to be consistently managed across implementing entities. These risks are judged manageable rather than high, because the Program Action Plan (PAP) sets out priority, time-bound actions—including institutional capacity strengthening, integration of ESHS clauses in contracts, functional and gender-sensitive grievance mechanisms, and enhanced monitoring and audits—specifically designed to address the identified gaps and progressively reduce risk during implementation.

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57. Adverse impacts are expected to be limited, site-specific and temporary and can be effectively minimized and/or mitigated with the adoption of proper environmental and social impact management procedures. The most adverse impacts are expected to be site-specific, temporary and limited during the construction phase. All investments will undergo an ESHS risks and impact screening and assessment process as per the national environmental and social management systems requirements. Consistent with the requirements of the Bank PforR Policy, the proposed Program operation will not finance activities that pose high ESHS risks.

58. Risks and impacts include: (i) Land disturbance and land-use impacts during installation of solar PV plants, transformers, and distribution/transmission lines, including temporary or permanent occupation of land with competing uses (agriculture, grazing, residences, or natural habitats); (ii) Visual and landscape impacts, depending on location, surrounding land use, and sensitivity of the receiving environment; (iii) Impacts on biodiversity and habitats, where installations or linear infrastructure are in ecologically sensitive areas, depending on siting, scale, and nature of the investments; (iv) Noise, dust, vibrations, and temporary access restrictions generated by construction and installation activities, potentially affecting nearby communities, livelihoods, or institutional services; (v) Waste generation and management risks, including construction waste, packaging, cables, damaged equipment, e-waste, and end-of-life solar panels and batteries, compounded by limited recycling and disposal solutions; (vi) Hazardous materials risks, including handling of batteries, transformer fluids, oils, and other

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electrical components, with potential soil and water contamination if not properly managed, while most manufacturing-related impacts occur outside Madagascar; (vii) Occupational health and safety (OHS) risks associated with work at height, electrical works, heavy lifting, battery handling, and maintenance activities, including risks of falls, electrocution, burns, and injuries; (viii) Community health and safety (CHS) risks, including electrocution and fire hazards linked to unsafe or informal connections following network expansion, as well as risks related to construction traffic and open works; (ix) Social risks related to labor influx, including potential SEA/SH risks. Contextual risks are influenced by Madagascar's high exposure to hazards and socio-political shocks, which have a direct impact on energy sector operations. The implementing agencies (MEH, JIRAMA) involved for ongoing projects (LEAD and DECIM) possess substantial experience with safeguards (Operational Policies) and, more recently, the Environmental and Social Framework (ESF). They need to enhancing their Environmental and Social Risk Management capacities; as their environmental and social performance is currently rated as "Moderately Satisfactory." Political dynamics and reputational issues, including prolonged governance challenges in the sector and recurring water and power outages, have contributed to political turmoil.

3.3 Exclusion Principle

59. The principle applies to Program activities that meet the exclusion criteria regardless of the borrower's capacity to manage such ESHS effects. In the PforR context, exclusion means that an excluded activity is not included in the identified program of expenditures (investment menu). In addition, an activity is not included if it requires the completion of a non-eligible activity to achieve its contribution to the PDO or any specific DLI.

60. The exclusion principle under the ASCENT Madagascar PforR is applied in a targeted manner by explicitly identifying program areas and activities with the potential to generate high environmental and social risks if not properly screened and managed. These include, in particular: (i) generation-related activities beyond small-scale solar PV (≤400 kW), such as construction of large-scale power plants or facilities requiring significant land acquisition or resettlement; (ii) installation of transmission and distribution lines traversing densely populated areas, sensitive habitats, or Key Biodiversity Areas (KBs/KBAs), where risks of involuntary resettlement, biodiversity loss, or community safety impacts could be significant; and (iii) activities involving hazardous materials or waste streams—notably batteries, transformer fluids, and end-of-life solar equipment—where national systems are not yet adequate to manage high or irreversible impacts. These activities are either explicitly excluded from the PforR scope or subject to strict eligibility screening, ensuring that only activities with localized, reversible, and manageable impacts are supported. The exclusion principle is operationalized through systematic screening procedures and reinforced by the Program Action Plan, which strengthens institutional capacity, oversight, and mitigation measures to ensure that higher-risk activities are avoided and that residual risks remain consistent with a Substanti**al** environmental and social risk rating.

61. The Program is designed to exclude investments that are likely to have significant adverse ESHS risks and impacts or are categorised as high-risk sub-projects under the World Bank ESF and Category A under Malagasy ESIA Regulations (MECIE Decree). The sub-project activities will be screened against the six core principles under the PforR and the relevant country systems, which will apply to all investments as a mechanism for avoiding, minimising, or mitigating adverse ESHS risks/impacts. All this will be captured in the POM that will specify the suitable criteria through which the program components will be screened as well as the screening form template.

62. The Program shall exclude projects likely to result in:

a) Any investments that trigger **high or substantial risk** rating under the World Bank Environmental and Social Framework (ESF) priniciples.
b) Air, water, or soil contamination leading to significant adverse impacts on health and safety of individuals, communities, and ecosystems.
c) Significant conversion or degradation of critical natural habitats or cultural heritage sites.
d) Workplace conditions that expose workers or adjacent community members to significant health and personal safety risks.
e) Large-scale changes to land-use or restriction of access to land and/or natural resources.

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f) Adverse E&S impacts covering large geographical areas, including transboundary impacts or global impacts such as greenhouse gas (GHG) emissions.
g) Significant, cumulative, induced, or indirect ESHS risks and impacts.
a) [6]. Limited resettlement may be permitted (to be decided by MEH and ONE, possibly following stakeholder consultation). Any such resettlement will require evidence of ownership or a Resettlement Action Plan (RAP) in accordance with the resettlement guidelines to be included in the POM/ESHS guidelines/manual.
b) Activities that involve the use of forced or child labour.
c) Activities likely to cause marginalisation of, or conflict within or among social groups.
d) Activities with high risks of Gender Based Violence (GBV), and Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH).
e) Activities that would result in significant cumulative impacts.
f) Activities that would:
    i. adversely affect lands or rights of Traditional Local Communities or other vulnerable groups;have adverse impacts on land and natural resources subject to traditional ownership or under customary use or occupation;
    ii. cause the relocation of vulnerable groups from land and natural resources that are subject to traditional ownership or under customary use or occupation; or
    iii. have significant impacts on cultural heritage that is material to the identity and/or cultural, ceremonial, or spiritual aspects of the affected communities;
    iv. concern investment on land for which ownership cannot be ascertained, land with any encumbrances, including boundary conflicts, family disputes, court cases, absentee landlords and succession challenges.

63. In the event that a proposed activity would lead to physical and/or economic the displacement of encroachers on the wayleave trace, the Implementing agency will be required to compensate such encroachers in line with the requirements of PforR Core Principle #4, which applies not only to those who own or have formal legal rights to the land from which they are being displaced (including renters, users, squatters, or encroachers), but also to those who as of a cut-off date occupy or utilize the land informally or without clear legal rights to do so. The screening criteria and process will be outlined in the POM, and as necessary, and will be in the ToR to be verified during the annual Independent Verification Audit (IVA). In addition, the POM shall clearly define the manner in which the Program will ensure vulnerable groups are included in the Program consultation process and access to Program benefits, including how the Program should cushion them against high connection costs and consumption tariffs.

The following activities will be specifically excluded from financing via this PforR in Madagascar:

- Construction of new and/or rehabilitation of existing hydropower plants;
- Construction of new and/or rehabilitation of existing thermal power plants;

[6] In the context of this Guidance, resettlement includes physical relocation of individuals and communities as well as the acquisition of land for program purposes. Because of the extreme sensitivity of land acquisition and resettlement, the Bank exercises caution when proceeding with any resettlement when the borrower cannot demonstrate that its systems meet the core principles and attributes or cannot ensure consistently satisfactory resettlement outcomes. It is not necessarily helpful to define fixed numerical thresholds for "large scale" because the significance of impacts depends very much on local contextual factors. The definition of significant resettlement impacts is closely related to the extent to which the borrower's systems align with the core principles and to the borrower's capacity to carry out land acquisition and resettlement in accordance with policy principles and requirements.

The emphasis should be on the potential for significant impacts on affected people regardless of scale, as significant adverse impacts are not acceptable to the Bank even if they affect only a small number of people. When the Bank team's assessment is that the borrower is not able to demonstrate resettlement practices consistent with PforR core principles, regardless of the size or severity of resettlement impacts, the PforR operation should proceed only after a separate review of agreed resettlement systems and capacity-building actions.

- Improvement of Transmission Networks (this may be financed through the ASCENT Madagascar IPF component); Construction of new high voltage transmission lines (this could involve resettlement) MV lines will be considered if they meet the risk limitations mentioned earlier. Limited resettlement may be allowed (criteria for 'limited' will be decided on a case-by-case basis by MEH and other concerned E&S management parties).

3.4 National ESHS risk evaluation procedures

64. Legal reference: Decree No. 2025-080 of January 28, 2025, sets out the rules and procedures for Environmental and Social Assessment for the Alignment of Investments with the Environment (MECIE). This decree, which replaces and updates the previous MECIE framework, brings it in line with international environmental and social standards, climate and biodiversity requirements, and includes enhanced stakeholder engagement as well as grievance mechanisms.

Project classification is based on nature, scale, location, and sensitivity of impacts as per the screening submitted to the ONE. MECIE provides for three (3) categories of development projects that reflect the different expected outcomes with regard to possible ESHS impacts, as follows:

- Category A: Projects subject to mandatory Environmental and Social Impact Assessment (ESIA) – Annex I
- Category B: Investments subject to mandatory Environmental and Social Commitment Program (PREES) – Annex II
- Category C: Compliance with sectoral regulations, neither ESIA nor PREES.

The ONE is the only body authorized to categorize all investment projects, based on nature, scale, location, and sensitivity of impacts

As per the above, the Decree establishes **three main instruments**, of which **ESIA (Environmental and Social Impact Assessment) and PREES** (Programme d'Engagement Environnemental et Social) are the most commonly used and relevant to ASCENT scope:

1. **ESIA** – E&S permit granted by the ONE
2. **PREES** – E&S authorization granted by the MEH
3. **Environmental prescription** – Category C projects – Establishment approval including Environmental prescription granted by the Prefet (Regional level scope) ou Head of District (District level)

65. ESIA procedure: Summary of requirements for ESIA are not developed because Category A activities will be excluded.

An **ESIA** is mandatory for:Projects with **significant, irreversible, or cumulative environmental and social impacts**;Projects located in or near: protected areas, critical habitats, or densely populated or socially sensitive zones.

66. PREES procedure – Step by step

A PREES applies to projects with:

- moderate, localized, and reversible impacts,
- rehabilitation, upgrading, or small scale infrastructure,
- activities not requiring a full ESIA but exceeding CCEES thresholds.

Step 1 – Project screening

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Screening: ONE determines that PREES (not ESIA) is required based on impact level.

Step 2 – PREES document preparation (prepared by the project promoter or his consultant)

The PREES includes:

- concise project description,
- identification of key environmental and social risks,
- mitigation and rehabilitation measures,
- implementation schedule and responsibilities,
- simplified monitoring plan.

Step 3 – Targeted consultation

- Consultations are proportionate to impacts.
- Focus on directly affected stakeholders and local authorities.

Step 4 – Review and approval
`

- For ASCENT activities, MEH reviews PREES through its Environmental Unit (CE).
- Decision is faster than ESIA.
- Environmental authorization is issued with conditions.

Step 5 – Implementation and monitoring

- Proponent must implement rehabilitation measures.
- MEH or delegated services monitor compliance.
- Sanctions apply in case of non-compliance.

Aspect	PREES
Impact level	Moderate / limited
Study depth	Simplified
Public consultation	Targeted
Review body	MEH
Approval time	Shorter

Cumulative Impacts

Possible cumulative impacts will need to be evaluated during the screening phase of all proposed sub-project activities. As mentioned earlier, any sub-project that may contribute significantly to significant cumulative impacts in relation to other (non-ASCENT PforR) activities in the intended sub-project area wil be excluded from consideration under this PforR project.

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Folowing are the main steps in evaluation of cumulativec impacts:

i. Determine spatial and temporal boundaries
ii. Identify Valued Environmental and Social Components (VECs)
iii. Identify all developments and external natural and social stressors affecting the VECs
iv. Determine present conditions of VECs
v. Assess cumulative impacts and evaluate their significance over predicted future conditions of VECs

Any cumulative impacts found to be significant may result in exclusion of the sub-project concerned.

Further details on evaluation of cumulative impacts will be provided in the ESHRIM manual.

3.5 Program Beneficiaries

67. The main Program beneficiaries will include the following:

i. **Households.** The Program is expected to provide households with improved energy access and better-quality electricity services. It will also have an increased pro-poor access focus, mainstreaming targeted subsidy mechanisms to make the connection affordable for disadvantaged and vulnerable groups like female-headed households. Access to electricity will allow the use of additional household supplements such as mobile phones, televisions, fan, refrigerators, time and energy saving cooking stoves etc. It will enable households to undertake productive and income-generating activities and enhance access to relevant electricity information and communication through phone, radio and television. Empirical evidence shows the health benefits associated with the use of electricity especially for women and girls due to the reduction of indoor air pollution from the use of kerosene lamps and candles for lighting.

ii. **Social institutions.** Improvements in the quality of public service delivery are expected through increased electricity connections, especially of public facilities such as schools; clinics; hospitals including health care centers that provide prenatal and postnatal reproductive health care services for women, girls and children (for example, for cold chain, child delivery, vaccine and medicine refrigeration, lighting, sterilization); and water pumping stations (for example, for safe drinking water) used by poor and vulnerable households.

iii. **Productive enterprises.** The Program mainstreams good practices for demand stimulation and productive uses. This includes demand simulation for women target groups to ensure they access productive uses of energy at affordable cost. Improved access to electricity supply will contribute to increased income and productivity of enterprises (particularly for micro/small/medium enterprises) and will assist them in reducing their dependency on expensive diesel generation that has a substantially higher per unit cost. In addition, productive uses of electricity can boost job creation and lead to overall positive spillover effects to the communities.

iv. **Gender-differentiated benefits.** Providing rural households, social services, and enterprises with improved electricity services has the potential to promote gender equality, create employment and business opportunities for women, and improve development outcomes for example, health and education.

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3.6 Potential Environmental, Social, Health, and Safety (ESHS) Benefits and Risks

3.6.1 Potential Environmental, Social, Health and Safety Benefits

68. The PforR Program will deliver ESHS benefits that will vary depending on the investment's menu. The potential ESHS benefits will include, but not limited to:

a. increased access to electricity, leading to Improved clean environment and living conditions through the use of cleaner energy
b. reduction in use of fossil fuels for powering generators and other equipment, leading to reduced emissions of air pollutants, greenhouse gases (GHG),
c. Improved safety on faulty transmission lines (e.g. reduction on electrocution)
d. reduced dependency on kerosene and firewood as sources of energy for cooking and lighting, which, in turn, will lead to reduced cutting of trees and reduced carbon emissions;
e. improved indoor air quality as a result of using less firewood and kerosene;
f. improved and reliable electricity services in Madagascar;
g. improvements in quality of public service delivery such as schools and health care facilities,
h. contribution to the inclusion of vulnerable households in line with the last mile connectivity program objectives;
i. reduced energy losses improved financial sustainability for JIRAMA;
j. inclusion of vulnerable households in line with the last mile connectivity program objectives.
k. enhanced technical capacities in the IAs to implement and manage public investments and ESHS effects

69. The program will implement climate smart and resilient energy infrastructure that improves resilience of local populations, especially populations vulnerable to crisis events as a result of climate change, such as floods and droughts.

3.6.2 Potential Environmental, Health and Safety (EHS) Risks and Impacts

70. The Program is expected to have direct and indirect effects on the EHS and climate change aspects. As mentioned earlier, the risks and impacts in this Program will mainly be limited to the construction phase. The risks are considered site specific, temporary in nature and reversible.

71. The potential EHS risks and impacts include, but are not limited to:

a. Disturbance and loss of existing vegetation and potential impact to flora and fauna species.
b. Localized noise and air pollution (dust and emissions) from construction activities.
c. Soil contamination and underground water pollution from spillage of oil and fuel associated with construction works.
d. Soil erosion and sedimentation of waterways especially during construction of LV distribution lines and substations.
e. Land degradation impacts from sourcing of construction material from quarry and borrow pits for use in civil works.
f. Scenic quality deterioration and environmental pollution from dumping of excavated material and impact to physical cultural resources.
g. Occupational health and safety incidents/accidents to workers at construction sites and community health and safety risks to the public, especially electrocution and falls from heights.
h. Increased generation and unsafe disposal of construction solid waste and wastewater.
i. Traffic obstruction and increased traffic-related safety risks.
j. Temporal disruption of public access to residences and businesses, especially during excavations near structures that have encroached the public land.

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k. Disruption of existing infrastructure or services such as drainage, sanitation, telecommunication utilities, power, and water supply especially during the construction phase.
l. Increased spread of sexually transmitted diseases including HIV/AIDs, Sexually Transmitted Diseases (STDs), and other communicable diseases such as tuberculosis, cholera, etc.
m. Water (surface and groundwater) pollution risks from transport, treatment and disposal of wastewater and faecal sludge from pit latrines/ septic tanks at camp sites, and other onsite sanitation facilities, if not properly handled.
n. At operational and maintenance phase, environmental risks and impacts are expected from the generation of electronic waste from used solar panels and batteries, which if not appropriately managed may cause toxic elements to leach underground and cause soil and water pollution

3.6.3 Potential Social Risks and Impacts

72. The proposed investments under ASCENT may pose potential negative social risks and impacts. The potential negative social risks and impacts will include, but not limited to:

a. Inadequate Environment and Social Staffing and budget allocation for ESHS risks management.
b. Loss of livelihoods through temporary displacements of traders, disruptions to businesses and public services, during construction of low voltage (LV) distribution lines.
c. Disruption of access and damage to public utilities and/or private properties.
d. Destruction of structures, crops and trees
e. Labour influx risks which may lead to an increase in crime, insecurity and upset community dynamics.
f. Use of Forced, child labour and abuse.
g. Potential public and community health and safety risks such as traffic accidents.
h. Increased Gender-Based Violence (GBV) and Sexual Exploitation and Abuse and Sexual Harassment (SEA-SH).
i. Lack of transparency and trust by communities due to poor consultations and stakeholder engagement with project beneficiaries, vulnerable and marginalized groups.
j. Discrimination against the vulnerable groups, especially women and minorities in selecting Program participants, lack of consideration of Persons with Disabilities (PWD) needs, access and suitable infrastructure.
k. Lack of clear guidelines presents the risk of targeting and exclusion of vulnerable groups for Program benefits.
l. Gender inequality in employment opportunities.
m. Elite capture or political interference in beneficiary targeting of the most deserving as well as selection and prioritization of investments.
n. Bias of contract(s) awarded to known or particular groups of contractors.
o. Inadequate mechanisms for stakeholder identification, engagement, monitoring and feedback.
p. Ineffective grievance redress and feedback mechanisms.

73. **The potential Program effects:** On the basis of program activities planned under the key results areas, the ESSA team and stakeholders who provided feedback identified potential ESHS effects associated with the Program as shown in Table 3-2 below. The potential ESHS risks and impacts from the proposed activities shall be handled by the PAP that is prepared as part of this ESSA. The PAP outlines the principles, steps, and procedures that will be followed during Program implementation to mitigate any potential adverse risks and impacts.

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3-2 : ESHS Effects Associated with Program Activities Under the

Result Area	Activities and Overall Risk Rating7	Possible sub-projects[i]	ESHS Effects		Proposed Mitigation and enhancement measures
			Benefits	Risks and Impacts	
RA 1: Increased access to on-grid electricity	**DLI 1: Increase in renewable electricity supply to JIRAMA Isolated centers consumers (Megawatt hour or 'MWh')** Overall Risk Rating: Substantial	Distribution grid reinforcement and expansion Medium Voltage (MV) connections Three-phase connections Single phase connectionsMaintenance, overhaul or replacement of JIRAMA old generation units Electrification of public institutions (schools, health centers, administrations)	▪ Encourage renewable energy generation, ▪ Improve the long-term security of electricity supply; ▪ Reduce the short- and long-term costs of delivering electricity services; Provide local economic and social benefits from electricity-related **projects**, activities and programs, including power generation projects; and ▪ Promote increased access to electricity to all households including the vulnerable groups, which will in turn contribute to	**Social** ▪ Limited or inadequate stakeholder engagement and disclosure of Program information ▪ Political interference leading to program benefits where political interests are high, leaving the poor and vulnerable groups without access to power ▪ Potential exclusion of Vulnerable groups and vulnerable households and individuals from Program benefits including consultations and electricity access due to their inability to pay for wiring and connection	▪ Promote and provide means for effective and inclusive engagement of stakeholders including monitoring the consultation process and providing feedback on the implementation of citizens' priorities. ▪ Disclose appropriate Program information on E&S risks and impacts in a timely manner to ensure meaningful consultations, in relevant local languages, in a manner that is accessible and culturally appropriate, considering any specific needs of groups that may be differentially affected

7 Please note that not all activities to be implemented within the framework of the respective Result Areas will bear the same risk rating. The E&S risk rating given for each RA reflects the highest possible risk related to some possible sub-projects.

Result Area	Activities and Overall Risk Rating7	Possible sub-projects[i]	ESHS Effects		Proposed Mitigation and enhancement measures
			Benefits	Risks and Impacts	
	DLI 2: New on-grid connections installed (Number) **Risk Rating:**		increased economic and social welfare ▪ Gender mainstreaming will promote inclusivity and sustainability of energy programs ▪ Reduce dependency on kerosene and firewood as sources of energy for cooking and lighting ▪	costs would mean a failure of the Progam to achieve its objectives for the Last Mile Connectivity ▪ Risk of elite capture by the comparatively more knowledgeable elites limiting the targeting of Vulnerable groups and other vulnerable households under last mile connectivity; ▪ The likely acquisition of wayleave for transmission/distribution line without compensation, and loss of land value along the wayleave due to usage restrictions may lead to risk of delayed Program implementation or high rerouting costs; ▪ Potential increase in GBV/SEAH cases, and communicable diseases due to influx of workers into sub-project areas **Environment, Health and Safety** ▪ Impacts on natural habitat and physical cultural resources due to poor siting, design and planning of infrastructures ▪ Potential destruction of crops, vegetation and	by the Program, or groups of the population with specific information needs, such as disability, literacy, gender, mobility, differences in language or accessibility. ▪ Ensure adequate documentation of all stakeholder engagement process including discussions held, key concerns raised, responses given and agreed actions. Collect photographic evidence to the extent possible. ▪ Support development of climate change screening tools to be integrated into the subprojects design, monitoring and tracking of climate change related risks and proposed mitigation and/or adaptation measures. ▪ Conduct feasibility and design studies which will identify proper siting, planning and execution of the sub-projects to minimize impacts on natural habitats and PCR resources. ▪ Develop an E&S screening checklist for screening sub-projects to identify any potential impacts to natural habitats and physical cultural

Result Area	Activities and Overall Risk Rating7	Possible sub-projects[i]	ESHS Effects		Proposed Mitigation and enhancement measures
			Benefits	Risks and Impacts	
				or/trees following the acquisition of wayleaves to construct transmission/distribution lines to strengthen distribution network and to connect new households and businesses ▪ Potential solid and liquid waste generation from project activities ▪ Potential increase in surface runoff from excavated areas and substations during rainy season that could lead to erosion in areas with unprotected soil in neighboring facilities ▪ Civil and electrical works are expected to expose the workers and the proximal community members to occupational safety and health (OSH) related hazards and accidents ▪ Inability of last mile customers to access accredited technicians to wire premises which may present health and safety risks when non-accredited technicians are used ▪ Equipment and machinery used could be a source of	resources before undertaking environmental assessments. ▪ Prepare ESMP/PREES as per the country regulations, and regulations, and incorporate an adequate monitoring plan in the contract documents. ▪ The subprojects budget should include the ESMP budget and should be included in the BoQ as a standalone item for implementation of ESMP. ▪ Develop standard operations procedure (SOP) guidelines for mainstreaming OHS and Community Health and Safety aspects in the ESHSM manual for adoption in Program implementation. ▪ The Program will partner with relevant agencies to enhance the capacity of implementing agencies on health and safety risks management based on national laws and regulations through training of ESHS staff on OHS. ▪ Develop a simplified OHS manual for contractors. ▪ Explore strategies to use alternative materials instead of wooden poles, such as plastic poles

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Result Area	Activities and Overall Risk Rating7	Possible sub-projects[i]	ESHS Effects		Proposed Mitigation and enhancement measures
			Benefits	Risks and Impacts	
				▪ hazardous and noxious waste i.e., running engines, oil from wet transformers, electronic waste, used engine oil and oil filters ▪ Limited awareness on safe usage of electricity to communities, especially in heavily populated areas. This can be mitigated through safety sensitization and awareness creation when connecting Ips to electricity ▪ Risk of electrocution and fires from illegal connections, especially during rainy seasons. In addition, there are also cases of power connections done by incompetent persons resulting in incidences of electrocution and a near miss electrocution of community members ▪ Community health and safety risks including spread of diseases such as HIV and AIDs. **Specific to sub-projects:** • Occupational health and safety (OHS) risks during	

Result Area	Activities and Overall Risk Rating7	Possible sub-projects[i]	ESHS Effects		Proposed Mitigation and enhancement measures
			Benefits	Risks and Impacts	
				installation and maintenance: Installation and commissioning of solar PV panels, batteries, inverters, and internal LV wiring involve work at height, electrical works, manual handling, and battery management, exposing workers to risks of falls, electrocution, burns, and injuries if safety procedures are not adequately applied. • Environmental risks related to battery and electronic waste: Deployment and eventual replacement of batteries, inverters, and electrical components may generate hazardous waste and e-waste, with potential risks of soil and water contamination if storage, transport, recycling, and disposal are not managed in accordance with national ESHS systems • Temporary disturbance to institutional services and users: Installation activities within operating schools, health centers, and administrative facilities may cause temporary service interruptions, noise, dust, and access constraints, potentially affecting students, patients, staff, and visitors, particularly in rural and underserved areas if	

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Result Area	Activities and Overall Risk Rating7	Possible sub-projects[i]	ESHS Effects		Proposed Mitigation and enhancement measures
			Benefits	Risks and Impacts	
				works are not properly planned and communicated. • Energy and hazardous materials associated with manufacture of equipment to be installed • Installation of distribution lines (footprint, possible interruption of human activities, and possible need for involuntary resettlement, either permanent or temporary) • Energy and hazardous materials associated with manufacture of equipment to be installed • • Installation of transformers and lines (footprint, possible interruption of human activities, and possible need for involuntary resettlement, either permanent or temporary) • Installation of distribution lines (footprint, possible interruption of human activities, and possible need for involuntary resettlement, either permanent or temporary) Possible ESHS impacts of maintenance, overhaul or replacement of JIRAMA old generation units are very dependent on the kind of power plant to be installed, overhauled or maintained.	

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Result Area	Activities and Overall Risk Rating7	Possible sub-projects[i]	ESHS Effects		Proposed Mitigation and enhancement measures
			Benefits	Risks and Impacts	
				Cumulative impacts from other projects within the project vicinity to exacerbate the impacts of the project i.e., vegetation clearance to further reduce the vegetation cover of project areas if they are being cut to pave way for another project. Note: sub-projects with possibly significant cumulative impacts will be excluded from consideration. Indirect impacts such as access to electricity leading to demand in raw materials such as wooden poles that lead to deforestation in order to supply wooden poles to suppliers.	

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Result Area	Activities and Overall Risk Rating7	Possible sub-projects[i]	ESHS Effects		Proposed Mitigation and enhancement measures
			Benefits	Risks and Impacts	
RA 2: Improved JIRAMA financial viability and performance (revenue increase, cost reduction, debts and arrears payment)	**DLI 3: Amount of Government subsidies transferred to JIRAMA to cover JIRAMA's operational gap** **DLI 4: Decrease in the stock of arrears to private sector, ADER and ARELEC according to the Debt restructuring plan adopted by the JIRAMA Board in January 2026** **DLI 5: Decrease in total system Llosses (technical and commercial) (Percentage)**	**Not relevant**	▪ Restore sustainability to the sector and provide a firm basis from which to implement future connectivity campaigns toward universal access ▪ Improved governance of energy utility companies ▪ Energy loss reduction ▪ Reduced reliance on emergency operating practices (e.g., deferred maintenance), which improves operational safety and system integrity ▪ Enhanced predictability and transparency of public transfers, supporting improved governance and accountability in the energy sector, Business operational efficiency Improved financial discipline and cash management within JIRAMA, strengthening institutional sustainability Restoration of trust with private suppliers and public agencies, supporting stable fuel supply and grid operations	▪ Inadequate consideration of ESHS effects at the planning stage, leading to little or no budget considerations for ESHS management activities resourcing (financial, human, equipment) at this stage ▪ Fiscal sustainability risk if government subsidies to JIRAMA are not aligned with medium-term cost-recovery and efficiency improvements, potentially increasing long-term budget pressure] ▪ Governance and fiduciary risks related to insufficient transparency, weak verification, or delayed execution of subsidy transfers and arrears payments [D2a_ASCENT...n_FEB 2026 | Word] ▪ Risk of re-accumulation of arrears if cash discipline, payment prioritization, and structural reforms are not sustained over time ▪ Social and institutional tension risks arising from perceived unequal or non-transparent arrears clearance among private suppliers, public agencies (ADER, ARELEC), or other creditors ▪ Short-term budgetary trade-off risks if arrears clearance and subsidy transfers constrain other	▪ Inclusion of ESHS specialists in the planning stages, and ensure adequate resources and budget is allocated to ESHS risks management ▪ Apply occupational health and safety (OHS) standards during loss reduction works, inspections, and network rehabilitation to mitigate worker safety risks F

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Result Area	Activities and Overall Risk Rating7	Possible sub-projects[i]	ESHS Effects		Proposed Mitigation and enhancement measures
			Benefits	Risks and Impacts	
			Reduced risk of service disruptions linked to unpaid fuel, power purchase, or service contracts Improved energy efficiency, reducing unnecessary generation and associated fuel consumption and emissions Enhanced financial performance of JIRAMA, freeing resources for maintenance, safety upgrades, and service expansion Improved grid stability and safety through reduction of technical losses linked to overloaded or poorly maintained infrastructure Increased equity and fairness in the electricity system by reducing commercial losses and improving billing and collection discipline	priority public expenditures [D2a_ASCENT...n_FEB 2026 | Word] ▪ Operational risks to service continuity if financial transfers or arrears payments are delayed, affecting fuel supply, IPP contracts, or system operations ▪ Occupational health and safety risks for JIRAMA staff and contractors during technical loss-reduction activities, including network rehabilitation, inspections, metering upgrades, and enforcement actions ▪ Social tension risks linked to commercial loss reduction measures, including actions against illegal connections, billing enforcement, or disconnection for non-payment ▪ Temporary service disruption risks during technical works aimed at reducing system losses if not properly planned and communicated ▪ Risk that efficiency gains and financial stabilization do not translate into environmental improvements if operational and investment reforms are delayed or incomplete	

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Result Area	Activities and Overall Risk Rating7	Possible sub-projects[i]	ESHS Effects		Proposed Mitigation and enhancement measures
			Benefits	Risks and Impacts	
RA 3: Improved JIRAMA governance and management	**DLI 6: Actions taken to strengthen JIRAMA's accountability and transparency systems**	**Not relevant**	▪ improving JIRAMA's liquidity, ensuring continuity of service, and strengthening financial sustainability.	▪ N/R	▪ N/R

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Result Area	Activities and Overall Risk Rating7	Possible sub-projects[i]	ESHS Effects		Proposed Mitigation and enhancement measures
			Benefits	Risks and Impacts	
RA 4: Expanded energy access through Decentralized Renewable Energy (DRE): rural electrification, PURE, and stand-alone PV projects	**DLI 7: Management contract signed by ADER with the competitively recruited Fund Manager and operational manual approved in accordance with the FNED decree, adopted by the Government (Yes/No)** **DLI 8: New electricity connections through Distributed Renewable Energy (DRE) solutions supported by ADER (Number)**	Solar PV development by hybridization of JIRAMA isolated thermal centers Construction of power plant with Independent Power Producers (IPPs) Deployment of Productive Use of Renewable Energy (PURE) installations	▪ DRE encourages energy democracy, local ownership, and aligns with Sustainable Development Goals, including SDG 7 (Clean Energy) and SDG 13 (Climate Action). ▪ Innovations in recent years in renewable energy	▪ DRE systems face obstacles like fragmented policies, insufficient funding, technical gaps, and governance issues. ▪ Other general risks during the construction period are similar to those raised for RA1 activities **Specific to sub-projects:** • Visual and landscape impacts • Recycling and disposal of end-of-life solar panels and associated equipment is a key area of concern. There is a clear problem with solutions on the horizon. • Footprint of solar PV panels may occupy land that has competing uses (agriculture, grazing, residences, or natural areas habitats, including KBs or KBAs). • Use of energy and hazardous materials and generation of hazardous wastes in manufacture of PV panels (probably not in Madagascar). • electrocution and fire ris**ks** linked to unsafe or informal connections following network expansion • Installation of transmission/distribution lines (footprint, possible interruption of human activities, and possible need for involuntary resettlement,	▪ See RA1.

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Result Area	Activities and Overall Risk Rating7	Possible sub-projects[i]	ESHS Effects		Proposed Mitigation and enhancement measures
			Benefits	Risks and Impacts	
				either permanent or temporary) • Occupational health and safety (OHS) risks during installation and maintenance: Installation of PV panels, batteries, inverters, and MV/LV components involve work at height, electrical connections, lifting of heavy equipment, and battery handling, exposing workers to risks of falls, electrocution, burns, and accidents if OHS procedures are not adequately applied. • Environmental risks related to waste and hazardous materials: Deployment and replacement of equipment may generate e-waste, packaging waste, and hazardous waste (notably batteries, oils, and electronic components), with potential risks of soil and water contamination if collection, storage, transport, and disposal are not properly managed. • Local disturbance and land-use related impacts: Installation activities at productive sites in rural and peri-urban areas may cause temporary noise, dust, access restrictions, and minor land occupation, potentially affecting nearby communities, farmers, or small businesses if site	

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Result Area	Activities and Overall Risk Rating7	Possible sub-projects[i]	ESHS Effects		Proposed Mitigation and enhancement measures
			Benefits	Risks and Impacts	
				selection and stakeholder engagement are inadequate. Note: Possible risks and impacts of IPP power plant construction and operation or PURE activities are highly dependent on the type of power plant to be installed.	

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Result Area	Activities and Overall Risk Rating7	Possible sub-projects[i]	ESHS Effects		Proposed Mitigation and enhancement measures
			Benefits	Risks and Impacts	
RA 5: Increased access to clean and improved cooking solutions	**DLI 9: New clean or improved cooking appliances provided through subsidy mechanisms (LPG, electric cooking, solar cooker, bioethanol, biogas, improved wood and charcoal stoves) (Number)**		▪ Reduction or elimination of poor indoor air quality, a leading cause of premature death. ▪ Reduction or elimination of women disproportionately endure the negative consequences of rudimentary cooking, while afforded limited ways to change to cleaner solutions. ▪ Reduction or elimination of lost time and productivity results in a huge economic cost due to hours spent collecting firewood and other fuel sources. ▪ Reduction in use of forest or wood-derived resources (wood and charcoal) that is one of the causes of deforestation in Madagascar. ▪ Lower greenhouse gas emissions compared to traditional cooking practices, generating climate mitigation co-benefits and contributing to SDG 13 (Climate Action) ▪ Economic benefits and job creation in clean cooking value chains, including manufacturing, distribution, installation, and maintenance of appliances	▪ The high pressure needed to store LPG results in occasional tank bursts if canisters are not stored properly and maintained. In addition, LPG is highly flammable. ▪ Exposure to nitrogen dioxide may occur. ▪ LPG is a greenhouse gas. ▪ Burns and scalding injuries due to improper use of new cooking technologies or lack of adequate user training ▪ Continued deforestation risk if improved biomass stoves are inefficient or if rebound effects increase biomass consumption ▪ Greenhouse gas emissions associated with LPG use, as LPG is a fossil fuel, despite being cleaner than traditional biomass ▪ Occupational health and safety risks for workers involved in appliance manufacturing, transport, installation, and servicing if OHS standards are not enforced ▪ Waste management risks related to end-of-life disposal of stoves, LPG cylinders, batteries, or solar components if systems are not in place ▪ Affordability and social exclusion risks if subsidy mechanisms fail to reach the poorest or most remote households ▪ Unequal access risks across gender, income groups, or geographic areas due to uneven distribution networks	▪ Covering the pot while cooking helps retain heat, which reduces the amount of energy needed to cook food. ▪ Use proper ventilation daily, such as range hoods, and turn exhaust fans on when cooking. Open windows and doors, turn on ceiling fans, or run a window air conditioner in warmer seasons. ▪ Use exhaust fans in bathrooms and kitchen/food prep areas. ▪ Use air exchangers as available. ▪ Establish and enforce clean cooking policies, standards, and subsidy manuals defining eligible technologies, safety requirements, and quality thresholds to reduce safety, environmental, and social risks under the P4R ▪ Integrate ESHS requirements into the Program Operations Manual (POM), including occupational health and safety (OHS), waste management, and fire safety provisions ▪ Ensure gender- and poverty-sensitive targeting criteria in subsidy design to reduce exclusion and inequality risks ▪ Mandate independent verification agent(s) (IVA) with environmental, social, and safety compliance checks as part of result verification ▪ Require incident reporting and corrective action mechanisms for safety-related events (e.g., LPG

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Result Area	Activities and Overall Risk Rating7	Possible sub-projects[i]	ESHS Effects		Proposed Mitigation and enhancement measures
			Benefits	Risks and Impacts	
				▪ Behavioral risks, including continued use of traditional stoves ("fuel stacking"), if new technologies are not culturally acceptable or reliable	accidents) linked to program-supported activities

Note: RA5 mitigation measures are largely operational. However, they are mentioned here as there are unlikely to be PREES undertaken in relation to PforR cook stove activities. Operational impacts for RA1 and RA4 will be addressed in the PREES that are likely to be undertaken for sub-projects to be implemented within the framework of those RAs.

4 National Environmental, Social, Health and Safety Management Systems Relevant to the Program

74. As outlined in the PforR policy, the country systems will be applied for management of ESHS risks of the Program interventions. It is therefore necessary to ensure that the Program is implemented within a robust system for effective management of ESHS risks. This section provides an overview of existing Malagasy policy, legal, regulatory, and institutional frameworks and their relevance for management of ESHS risks of the ASCENT Program. It also identifies gaps if any, in the adequacy and effectiveness of the system for the management of the ESHS risks.

75. Based on the analysis of the country systems, no major gaps in Malagasy legislation in comparison to the six World Bank PforR Core Principles are expected related to the administration of Program activities. However, some gaps still exist, more on social risk and impacts management. The gaps in the country system expected related to the administration of Program activities identified by the ESSA are largely in the acquisition of land, and the inclusion of vulnerable and disadvantaged groups related to core principles 4 and 5 respectively. They include, (i) non-compensation of persons occupying land without the consent of the owner (e.g., squatters/encroachers) for improvements made on land (ii) lack of clarity on livelihood restoration or enhancement, (iii) insufficient targeting and inclusion of vulnerable and other disadvantaged or vulnerable individuals and groups in participation and benefits sharing, (iv) insubstantial public participation, and (v) RAP preparation, review, approval and disclosure are not entrenched in the Land Act, submission of RAP is not a mandatory requirement (but considered a good practice), and ONE only requires the submission (for informative not approval purposes) of a RAP under high-risk projects related to core principles 4 and 5, (v) there are no clear laws on the agency responsible for resettlement activities, despite existence of a Department of Resettlement under the Office of the Vice President These weaknesses have been enhanced under the Program to ensure the WB PforR Core Principles requirements are met (see Chapter 8).

76. The assessment of how the ESHS systems functions in practice is presented in Chapter 8 of this report, which is structured as a SWOT analysis of Implementing Agencies' capacity to manage the ESHS risks and impacts in line with the country's policies, legal and regulatory frameworks as written, and whether these are in line with the PforR Financing requirements.

77. Annex 9.1 presents Malagasy policies, regulations, and legislative frameworks that are applicable for the management of ESHS effects of the ASCENT Program, as well as some gaps that have been identified.

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5 Institutional Arrangements for the Management of Environmental, Social, Health and Safety (ESHS) for the Program

78. This section describes the country's institutional framework for the management of ESHS risks and impacts for realization of the proposed program benefits.

79. The ESSA found that a number of institutions have varying degrees of mandates for the management of ESHS effects. However, the efforts of these institutions are uncoordinated, and their activities are not planned in reference to each other. Consequently, there is limited consultations among the institutions and in most cases, they operate independently of each other, with the result that their effectiveness is hardly felt in practice.

80. For most implementing agencies, roles and responsibilities for the GRM management are not clearly defined in existing institutional arrangements. While grievance handling functions may exist and are often explicated by staff, there is no formally designated GRM focal point, standardized procedure, or clear accountability framework. This lack of clarity limits the effectiveness, consistency, and traceability of grievance intake, resolution, and reporting. However, the MEDD and the ONE have clearly defined roles in grievance management through established environmental and social compliance and complaint-handling mechanisms. These institutions are responsible for receiving, registering, and following up on grievances related to environmental and social impacts, including those arising from project activities. Their mandates provide a structured basis for grievance oversight, monitoring, and reporting in line with national regulations.

81.

82. 5-1 below presents the various institutions that will be involved in the management of ESHS effects of the ASCENT Program.

5-1: Institutional Framework for ESHS Management Under the Madagascar ASCENT

	Institution	Responsibilities	Relevance to the program	Responsible for GRM Management
1.	Ministry of Energy and Hydrocarbons (MEH)	The M**EH** is the national authority for energy policy, planning, electricity, hydrocarbons, clean cooking. It is responsible for designing and implementing the government's energy policy and downstream hydrocarbons policy, with a view to ensuring a supply that meets demand, is of the highest quality, and is available at the lowest possible cost. Both JIRAMA and ADER are attached to the MEH.	• Policy leadership and sector coordination: MEH provides strategic direction for the energy sector, oversees JIRAMA and ADER, and ensures alignment with the national M300 Energy Compact, including integrated electrification planning and	

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	Institution	Responsibilities	Relevance to the program	Responsible for GRM Management
			regulatory modernization • Implementation of enabling reforms and monitoring systems: MEH leads the establishment and operation of the Compact Delivery and Monitoring Units (CDMUs), oversees nationwide MTF surveys, and strengthens MEL systems to ensure credible verification and reporting of PforR results. • Execution of clean cooking and DRE scaleup responsibilities: MEH supports adoption and regulation of clean and improved cooking solutions under Result Area 5, including RBF mechanisms and consumer facing programs to expand market uptake.	
		Issues and oversees E&S permits for moderate to low-risk Energy sector projects.	• Issues E&S permits • Oversees environmental and social compliance for	

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	Institution	Responsibilities	Relevance to the program	Responsible for GRM Management
			lower-risk energy projects through its "Cellule Environnemental e", ensuring environmental and social integration within sector decisions • Reviews and validates PREES-level environmental documents (instead of full ESIA) for moderate or low-risk energy investments • Monitors implementation of environmental commitments during project construction and operation in coordination with ONE	
2.	ARELEC (Electricity Regulatory Authority)	Regulates electricity sector (tariffs, licenses, QoS[8]). Replaces ORE	Provides regulatory approvals & supervises operators under the Program: • Regulatory modernization and enforcement: ARELEC is responsible for operationalizing the updated electricity regulatory framework,	

[8] Quality of Service: set of mechanisms that allow a network to prioritize and manage different types of traffic to ensure performance levels

	Institution	Responsibilities	Relevance to the program	Responsible for GRM Management
			strengthening oversight of the energy sector, and supporting implementation of tariff methodologies essential for JIRAMA's financial recovery • Institutional strengthening and capacity building: Under the IPF component, ARELEC benefits from technical assistance to improve regulatory effectiveness, including support to MEL systems, coordination mechanisms, and organizational upgrades such as the adoption of its organizational decree • Enabling private-sector participation and market development: By improving regulatory clarity and oversight, ARELEC plays a key role in creating conditions for private sector engagement in renewable energy,	

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	Institution	Responsibilities	Relevance to the program	Responsible for GRM Management
			decentralized solutions, and clean cooking markets under the Government's M300 Energy Compact.	
3.	ADER (Rural Electrification Agency)	ADER is a public administrative institution created in 2002, under the technical supervision of the Minister of Energy and Hydrocarbons. Its mission is to implement policy in the rural electricity sub-sector. ADER implements rural electrification, licenses operators, manages off-grid frameworks.	Coordinates off-grid/mini-grid deployment & compliance: • Lead agency for decentralized renewable energy (DRE) expansion: ADER is responsible for accelerating off-grid and mini-grid deployment, including standalone solar systems and Productive Use of Renewable Energy (PURE) installations, as a core pillar of Result Area 4. • Management of Results-Based Financing (RBF) for off-grid access: ADER (together with FNED) oversees the RBF mechanisms that incentivize private operators to deliver verified new off-grid electricity connections. This includes payment	

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	Institution	Responsibilities	Relevance to the program	Responsible for GRM Management
			processing, verification coordination, and ensuring adherence to quality standards • Electrification of priority public institutions: ADER supports deployment of solar PV and storage solutions for schools, health centers, and administrative buildings through long-term contracts with private providers, contributing to human capital and service delivery improvements • Strengthened through technical assistance under the IPF component: ADER receives institutional support—including MEL systems, geospatial tools, and sector coordination assistance—to improve implementation capacity and ensure effective DRE and clean-cooking	

	Institution	Responsibilities	Relevance to the program	Responsible for GRM Management
			market development.	
4.	JIRAMA (National Utility)	JIRAMA is Madagascar's national water and electricity company. Created on October 17, 1975, it resulted from the merger of two companies that were engaged in similar activities at the time: the Malagasy Water and Electricity Company (SMEE) and the Madagascar Energy Company (SEM). JIRAMA operates national electricity grid, production & distribution. It is responsible for reinforcement and extension of electricity transmission and distribution (lines, posts, sub-stations) and improvement of electricity supply reliability in urban and peri-urban areas. JIRAMA is responsible for improving access to electricity, and for minimizing electricity losses.	• Partner for hybridization, network upgrades & integration. • Expand on grid electricity access: JIRAMA is responsible for providing new medium voltage, three phases, and single phase prepaid connections, supporting national access targets and grid densification • Hybridize isolated centers with renewable energy: JIRAMA leads the commissioning of hybridized isolated centers (solar PV + storage) to reduce thermal generation costs, improve reliability, and unlock new customer connections • Improve financial performance and cash discipline: JIRAMA must ensure timely payment of all current invoices, avoid	

	Institution	Responsibilities	Relevance to the program	Responsible for GRM Management
			accumulation of new arrears, and contribute to arrears clearance through the agreed 4% share of repayments. It also commits to meeting EBITDA improvement targets under the Recovery Plan • Strengthen governance and transparency: JIRAMA implements governance reforms including appointment of deputy CEOs, functional restructuring, signing performance contracts, publishing audited financial statements, and improving procurement and internal audit systems • Optimize operational performance and reduce losses: JIRAMA is tasked with reducing technical and commercial losses, improving collections, managing isolated centers strategically, and	

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	Institution	Responsibilities	Relevance to the program	Responsible for GRM Management
			implementing cost efficiency measures to restore financial viability	
5.	Fund Manager & FNED Funds	Manages financing for off grid solar & sustainable energy. Provides financing for sustainable energy expansion, serving as a national fund used to support investments in renewable energy and off-grid electrification. Supports affordability mechanisms by contributing to subsidies, Result-Based Financing (RBF), or blended finance schemes that help households and SMEs access solar systems and other clean-energy solutions. Facilitates private-sector participation by channeling financial resources toward companies involved in renewable energy and energy-access markets, helping expand coverage in underserved areas.	Support Result-Based Financing & subsidies for solar and clean cooking equipment. • Manages the Results-Based Financing (RBF) mechanism for off-grid electrification, including adoption of the FNED decree, contracting a competitively selected Fund Manager, and approving the operational manual • Channels performance-based payments to private operators for verified new off-grid connections under Result Area 4, working jointly with ADER to accelerate rural electrification.	
6.	Ministry of Environment & Sustainable Development (MEDD) / ONE (National Environment Office)	Lead environmental policy; manages ESIA system for substantial to high-risk Energy project.	• Screens and classifies projects to determine whether they require a full ESIA, a simplified assessment- a	

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	Institution	Responsibilities	Relevance to the program	Responsible for GRM Management
			PREES under the MECIE system. • Reviews and approves ESIA reports, including validation of Terms of Reference, evaluation of impacts, and decision-making through the environmental conformity process (CCES[9]) • Issues the E&S permits • Oversees public consultation compliance, ensuring that stakeholders are informed, consulted, and their feedback integrated into the ESIA documentation • Monitors compliance and enforces obligations, conducting site inspections, verifying ESMP implementation, issuing non-conformity notices, and requiring corrective actions during construction and operation	

[9] Cahier des charges environnementales et sociales : E&S requirements through the permit

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	Institution	Responsibilities	Relevance to the program	Responsible for GRM Management
7.	Ministry of Labor & Social Laws	Regulates OHS, working conditions.	• Ensures contractor compliance with OHS & labour laws. • Enforces national labour laws and OHS regulations through the labour inspection system, ensuring compliance with rules on working hours, wages, workplace safety, hygiene, and the protection of workers • Conducts workplace inspections to verify safety conditions, identify hazards, check cleanliness, equipment safety, and general welfare measures, and to require corrective actions where needed. • Provides guidance and technical advice to employers and workers on best practices for complying with OHS requirements and improving workplace safety and hygiene • Oversees implementation of the national	

	Institution	Responsibilities	Relevance to the program	Responsible for GRM Management
			OHS framework, including accident prevention, worker protection measures, and coordination with occupational health services to prevent deterioration of workers' health	
8.	Ministry of Land Use & Spatial Planning	Oversight of land acquisition and expropriation processes Support to land tenure regularization and land matriculation Coordination with implementing agencies on land-related risk management	Supports land access, resettlement requirements.	
9.	Clean Cooking Actors (MEH, Ministry of Trade, private LPG distributors)	Regulates LPG imports, pricing, safety standards; promote modern cooking.	Ensures compliance for LPG/clean cooking components, safety norms & market expansion. Ministry of Energy and Hydrocarbons (MEH): • Lead institution for clean cooking scale-up, responsible for expanding access to clean and improved cooking technologies under Result Area 5. • Manages the Results-Based Financing (RBF) mechanism for clean cooking, including consumer incentives, quality standards, and	

	Institution	Responsibilities	Relevance to the program	Responsible for GRM Management
			behavior-change/ awareness campaigns. ADER for DRE-linked clean cooking integration (not the primary clean-cooking lead but appears where clean cooking intersects with DRE and access programs): • Supports off-grid market development, including integration of clean cooking solutions within decentralized renewable energy programs and rural access initiatives. • Independent Verification Agent (IVA)-(Not an implementer but a required actor in the clean cooking results chain.) • Verifies clean-cooking equipment deployment before payments are released under the RBF system, ensuring that MEH's clean-cooking targets are measured,	

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	Institution	Responsibilities	Relevance to the program	Responsible for GRM Management
			validated, and credible. • Private sector clean-cooking solution providers- (Manufacturers, importers, distributors) • Produce, import, or distribute approved clean cooking equipment such as improved biomass stoves, ethanol stoves, electric cooking devices, etc., participating in the RBF through verified market expansion.	
10	**Ministry of Population and Solidarity**	This ministry is responsible for: • Gender equality and women's empowerment • Implementation of the National Gender Policy (Politique Nationale de l'Égalité Femmes-Hommes) • Prevention and response to Gender-Based Violence (GBV) • Social protection and support to vulnerable groups, including women and children	The MPS is the lead national authority on gender equality, women's empowerment, GBV prevention, and protection of vulnerable groups in Madagascar. Its role in ASCENT is normative, coordination-oriented, and oversight-related, not direct implementation of energy investments.	
11	**Decentralized Territorial Authorities (Regions, Districts, and Communes)**	Decentralized authorities are responsible for local development planning, coordination of development initiatives, community engagement, and administration at regional, district, and commune levels. Local authorities facilitate stakeholder engagement, community consultations, grievance redress, and alignment of ASCENT supported subprojects with local development priorities, thereby strengthening transparency, accountability, and community ownership of the Program.	They are significant for the proposed Program for its potential to assist in communications and information dissemination and stakeholder engagement, grievance resolution, in ensuring proposed project is carried out with full and meaningful consultation and that compensation for loss of any asset or income is done according to expectations of	

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	Institution	Responsibilities	Relevance to the program	Responsible for GRM Management
			equity and efficiency with each well-functioning grievance system.	

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6 Capacity Assessment for Managing Program ESHS Effects

83. This section contains an analysis of the performance of key implementing institutions/agencies associated with the ESHS legal/regulatory framework for the proposed Program. The section also highlights the challenges of the institutional framework along with an assessment of the current capacities. Further, the section analyses the processes of planning, monitoring, and decision making in the Program, the strategy adopted by the country, and the current grievance redress systems in place; all from an ESHS perspective.

84. The ESSA team assessed the quality and efficacy of the ESHS management system, particularly focusing on institutional capacity, structure, practices, procedures, mechanisms, and effectiveness of Ministries, Departments and Agencies (MDAs) tasked with ESHS management at national and regional levels, and the agencies that will be involved directly in implementing the proposed program. The team also consulted with the implementing agencies and stakeholders, to understand their role in the implementation of this Program. The assessment was conducted based on previous similar engagements of the systems within these institutions, and their performance records on IPF projects funded by WB since PforR is a new financing instrument in Madagascar.

6.1 Environmental, Health and Safety Management Systems

6.1.1 Madagascar National Office for Environment (ONE)

Policy and Legislative Framework Support

85. Madagascar has a robust legal framework for environmental management, beginning with the Constitution. The ONE is the main agency responsible for environmental management in Madagascar. It is an agency within the Ministry of Environment and Sustainable Development (Ministère de l'Environnement et du Developpement Durable, or 'MEDD'). Please see Table ..5-1 in Section 5. for details.

Decree No. 2025-08 establishes the rules and procedures for Environmental and Social Assessment for the Compatibility of Investments with the Environment (Mise en Compatibilité des Investissements avec l'Environnement, or 'MECIE'). MECIE provides the legal ground for the establishment of ONE as well as other institutions responsible for the protection and management of the environment. Several guidelines and regulations have also been prepared by ONE including environmental impact assessment/environmental assessment (EIA/EA) regulations, which are aimed at ensuring that projects are subjected to E&S risk analysis to determine their likely adverse impacts before commencement. ONE is mandated to commit resources and implement actions necessary for effective E&S management in Madagascar.

86. ONE is charged with enforcing MECIE's provisions, which include providing for a legal and institutional framework for sustainable management of the environment, prevention and control pollution, waste management, environmental quality standards and public participation. Furthermore, it gives ONE mandates to undertake environmental enforcement and compliance; review and monitoring of environmental impacts assessments; research, facilitate public participation in environmental decision-making, raise environmental awareness and collect and disseminate environmental information. Thus, ONE's main task is to review and recommend for approval of environment impact statements; identify projects and program or types of projects and program, for which environmental audit or environmental monitoring must be conducted under this Act; enforce and ensure compliance of the national environmental quality standards; and initiate and evolve

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procedures and safeguards for the prevention of accidents which may cause environmental degradation and evolve remedial measures where accidents occur.

87. ONE has significant expertise in environmental assessment and management, with robust capabilities in permitting processes, although its enforcement capacity is comparatively weaker. The MECIE decree has gaps in addressing social issues as mandated by law and in practice. ONE has limited internal capacity to review social risks, with poor coordination and collaboration with the departments responsible for social risks management such as the gender division, department of social security and protection.

88. ONE can request and reviewi but cannot approve RAPs, with only advisory role on the report. In addition, ONE is not in charge of overseeing the RAP activities, with the role left to the implementing agencies themselves. Currently, Madagascar does not have a single dedicated institution mandated to "approve" and oversee RAPs. For projects with a RAP, oversight is carried out by the Line Ministry with the implementing agency and in collaboration with the MEF and MATSF.

89. Where established, environmental units at the regional level and offices at district level are the collaborating partners in the EIA process. The linkages between ONE and the regional environmental units and district offices are legally binding to ensure clear lines of command to facilitate effective implementation. However, not all regional units are operational, and therefore some of the Regional units are stretched outside their areas of jurisdictions.

90. According to MECIE Article 15, the Ministry of Finance analyzes the compliance of public investment projects. For public investments, the funds necessary for conducting EIAs and ESAs must be provided for in the budget of each public administration, as stipulated in Articles 88 and 112 of MECIE. To this end, the Ministry of Finance guarantees the availability of the funds necessary to ensure that public investment projects are compatible with the environment. This gives ONE specific responsibilities for, among others, the following:

- Categorizing all investment projects;
- Coordinating the assessment of EIS files for Category A projects;
- Organizing the work of the CTE in the assessment of EIA files;
- Drafting the Environmental and Social Specifications or CCES in Malagasy and French;
- Issuing Environmental Permits;
- Coordinating the Environmental and Social Monitoring Committee or CSES and monitoring the compliance of project CCES;
- Managing complaints about projects with an Environmental Permit;
- Issuing environmental discharge certificates.

91. According to MECIE Article 21, the Environmental Unit within each Ministry is responsible for integrating in particular the sectoral and social dimensions relevant to its parent ministry into the environmental and social assessment process and issues the relevant technical opinion. In accordance with the provisions of Decree No. 2003-439 of March 27, 2003, establishing an Environmental Unit within each of the aforementioned ministries, said Unit is established in the organizational chart of each ministry (including the CE established at MEH). In this capacity, it examines and rules on PREES files within its jurisdiction and carries out all related procedures in accordance with the legal provisions governing the related activity. Among other things, it oversees investment projects falling within the remit of its parent ministry.

92. Article 31 provides that local authorities in project locations are represented by municipalities. The mayor participates in raising awareness and informing local communities concerned, as well as in the assessment, monitoring, and control carried out by central or decentralized authorities.

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The following sections provide more details on Malagasy requirements with respect to ESHS management.

Public Participation

93. Article 46 of Mecie specifies that public participation include an initial consultation with stakeholders conducted by the developer prior to the completion of the ESIA and SEA during the scoping phase, to identify the issues and risks associated with the project. Article 47 underlines that the purpose of public participation in the environmental and social assessment is to involve stakeholders in this process and inform them of the existence of the policy, plan, program or project and the issues involved, to gather their concerns and opinions, in order to ensure more inclusive, informed and socially accepted decision-making. The organization of this participation is the responsibility of the competent State Representatives, depending on the scope of the project, in collaboration with the ONE and the CTE for the ESIA, the Ministry responsible for the Environment for the SSEA, and the sectoral ministries for the PREES. Participation may take the form of direct consultation, public inquiry, or public hearing. It includes a phase of information on the project, followed by a phase of consultation and dialogue aimed at gathering the opinions of the parties concerned.

94. Article 48 requires that traditional authorities at project sites participate in public consultations, along with local and relevant central or decentralized authorities. The aim is to ensure, on the one hand, the inclusive, effective, and transparent participation of all stakeholders concerned during the consultations and, on the other hand, to guarantee respect for local customs and traditions in the implementation of investment projects and the development of PPPs within the framework of strategic environmental and social assessment.

95. Article 49 holds that both a public inquiry and a public hearing may be held. In the event of major social conflicts, the public inquiry procedure must be conducted in parallel with the direct consultation procedure. Prior to the public hearing on the ESIA, if the investment project requires resettlement, consultation with the affected persons, followed by validation of the resettlement action plan, must be carried out. The organization of inquiries and hearings at various levels, such as local, regional, or national, is left to the discretion of the Ministry of the Environment for the EESS, and the ONE for the ESIA. The practical arrangements for public participation are specified intechnical environmental guidelines.

Grievance Management System (GMS)

96. MECIE provides that in order to enable stakeholders to submit their concerns confidentially and transparently, a GMS will be established to ensure that complaints are handled promptly, impartially, and in a documented manner, with appropriate solutions provided according to the severity and impact of the concerns raised.

Gender

97. The Malagasy legislative framework governing gender is embodied by Law No. 2019-008 of January 16, 2020 on combating gender-based violence. The Decree sets out provisions relating to the punishment of gender-based violence. In addition, it establishes requirements for the prevention, protection, and care of survivors. The Decree sets out provisions relating to the punishment of gender-based violence.

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98. In addition, it establishes requirements relating to the prevention, protection, and care of survivors of GBV. Dedicated services exist at the police level and in terms of legal, medical, and social support. However, these services remain limited and lack diversity. Furthermore, in its wording and application, the law is based on a restrictive definition of GBV based on sex, excluding any notion of self-defined gender identity and violence based on that identity. Violence against the LGBT community, in the rare cases where it is reported, cannot be dealt with as GBV. Furthermore, the law is invoked in cases of repeated violence by the same perpetrator (domestic violence or incest), a situation that rarely applies to sex work.

Involuntary resettlement

99. MECIE Article 155 holds that involuntary resettlement of populations affected by investment projects must be carried out in a manner that "respects human dignity, gender, fundamental rights, including the right to fair and equitable compensation, the right to consultation and participation in informed decision-making, and the livelihoods of those affected." Social, economic, and cultural impacts must be taken into account in order to avoid or minimize negative consequences on communities.

100. Article 156 continues that for projects involving land acquisition, stakeholders must explore all alternatives to minimize involuntary resettlement. Where resettlement is unavoidable, adequate mitigation measures must be provided to protect the rights of displaced persons. Article 157 requires that any investment project requiring the acquisition of land or other natural resources must include the preparation and approval of a Resettlement Action Plan (RAP) before the start of expropriation or involuntary displacement of populations. The terms of the RAP are defined by the legal and regulatory framework in force.

Waste Management

101. MECIE requires that development projects must:

a) Establish management systems for industrial, hazardous, toxic, or biomedical waste to prevent soil, water, and air contamination. Secure protocols for treatment, storage, and disposal must be implemented in accordance with applicable environmental and health standards.

b) Ensure sustainable management of solid waste from sectors such as mining, construction, and agriculture by promoting reduction, recycling, reuse, and safe disposal.

c) Promote the development of sustainable energy sources, such as renewable energy, energy efficiency, and energy conservation.

d) Promote the development of sustainable agriculture, including organic farming, sustainable forestry, and sustainable fisheries.

b) Ensure sustainable management of solid waste from sectors such as mining, construction, and agriculture, promoting reduction, recycling, reuse, and safe disposal of materials. Measures must be taken to prevent this waste from negatively affecting the environment, particularly landscapes, land quality, and water resources.

Biodiversity management

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102. MECIE requires that development Projects must avoid the destruction, degradation, or fragmentation of natural habitats and/or habitats with proven ecological functionality. In the event of such impacts, compensatory measures following the ERC sequence must be put in place to protect animal and plant species, with particular attention to habitats and species that are endemic and/or threatened according to current standards.

Furthemore:

- Activities likely to cause misuse of biological resources and deforestation must be regulated in order to minimize forest loss, biodiversity degradation, and contributions to climate change.
- Projects must prevent the spread of invasive alien species that can destabilize local ecosystems.
- Projects must prevent the loss of ecosystem services, the degradation of which has consequences for human well-being, including: (i) provisioning services; (ii) regulating services; (iii) cultural services; (iv) supporting services.

Water resource management

103. MECIE requires that development projects must:

a) Ensure that water use does not impede access to water resources for surrounding populations, does not cause significant hydrological changes, and avoid over-exploitation of water resources.

a) Ensure that water use does not impede access to water resources for surrounding populations, does not cause significant hydrological changes, and avoid overexploitation that could lead to a drop in groundwater and river levels, endangering aquatic ecosystems and the water supply of local communities. In the event of disruption, propose alternative solutions.

b) Ensure that industrial discharges, mining, or agricultural activities do not contaminate water resources, in order to protect aquatic biodiversity and access to drinking water;

c) Adopt management practices to prevent soil erosion, which could harm rivers and wetlands and create hydraulic disturbances in general.

Pollution, air quality, climate

104. Projects must be designed to minimize GHG emissions and assess their impact on global climate change. Projects must reduce air pollution by limiting emissions of pollutants such as fine particulate matter, sulfur dioxide, and nitrogen oxides in order to protect public health and maintain air quality

Organization and Program Structure

105. To fulfil its functions, ONE works through linkages to institutions established by the MECIE at different administration levels including environment units and departments in all ministries, environmental management offices and environmental committees at the regional and district levels. Within each ministry, it is the Environmental Section's responsibility to ensure that environmental concerns are integrated into the ministry's social economic developmental planning and project implementation to ensure attainment of environmental sustainability.

Human Resources

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106. ONE's lack of sufficient resources creates a situation where projects with possibly significant impacts on the environment are not regularly supervised or monitored to ensure that they are complying with license obligations and regulations or implementing mitigation measures. In the end, monitoring is often left to self-monitoring by the proponent of a project with little oversight from ONE independent view particularly at districts and other lower levels.

Summary of Challenges at ONE on ESHS Management

107. The main challenges of ONE at the national and regional levels are:

i. Understaffing within the organization to enhance Compliance levels at the national and district levels.
ii. Lack of financial resources, technical equipment, and transportation allocation for effective monitoring and supervision;
iii. Poor coordination with other multi-agencies in charge of managing construction activities, ESHS risks management;
iv. Political interference which results to non-compliance on ESHS process and management, with preference given to development; and

Recommendations to enhance ESHS Management at ONE for the program

108. The following is recommended to enhance ESHS management for ONE:

i. Include ONE early in program planning and take part in ESHS risk screening for sub-projects.
ii. Collaborate with ONE to improve public awareness and education, and capacity building of the ONE officers at the district levels, program's implementation agencies, and contractors' workers on ESHMP implementation to enhance compliance.

6.1.2 Environmental Unit within the MEH (CE MEH)

109. In accordance with Article 21 of the MECIE Decree (Decree No. 2025-080) and Decree No. 2003-439 of March 27, 2003, an Environmental Unit (Cellule Environnementale) is established within each sector ministry, including the Ministry of Energy and Hydrocarbons (MEH). The CE MEH is responsible for ensuring the integration of environmental and relevant social considerations into sectoral policies, plans, programs, and investment projects under the mandate of the Ministry, in line with the principles of sustainable development. [micc.gov.mg], [textes.lexxika.com]

110. Within the MECIE framework, the CE MEH plays a technical and advisory role in the environmental and social assessment process. It is responsible for reviewing Preliminary Environmental and Social Assessment (PREES) files and other environmental and social assessment documents for projects falling within the energy and hydrocarbons sector, and for issuing sector-specific technical opinions to inform decision-making by ONE and the Technical Evaluation Committee (CTE), as applicable.

111. The CE MEH contributes to the screening and categorization of sectoral investment projects, ensures consistency between proposed projects and national energy policies, and supports the application of environmental and social mitigation measures relevant to the energy sector. In accordance with MECIE, the CE MEH does not have approval authority over Environmental and Social Impact Assessments or Environmental Permits, which remain under the mandate of ONE and the Ministry in charge of the Environment, but it provides essential technical input throughout the assessment process.

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112. In addition, the CE MEH is responsible for overseeing the environmental performance of investment projects under the Ministry's jurisdiction during implementation, in coordination with ONE, decentralized environmental services, and other competent authorities. This includes supporting monitoring activities, facilitating information flow between project proponents and regulatory institutions, and contributing to compliance with Environmental and Social Specifications (Cahiers des Charges Environnementales et Sociales – CCES) applicable to the energy and hydrocarbons sector.

Summary of Challenges at MEH CE on ESHS Management

113. The main challenges of MEH CE at the national and regional levels are similar to those facing ONE (see above'):

- Lack of dedicated financial and logistical resources, including no specific budget line, no cost-recovery mechanism for PREES projects, and absence of vehicles for field supervision
- Limited institutional and human capacity, with a small core team centralized in Antananarivo
- Weak social risk management, particularly limited experience with resettlement, exclusion of non-titled occupants from compensation, and no targeted measures for vulnerable groups
- Absence of structured stakeholder engagement and behavior-change strategies, with community engagement largely delegated to project promoters and no impact evaluation
- Underdeveloped grievance redress mechanisms, characterized by informal channels, lack of records or statistics, no public awareness, and no internal complaints or harassment committee

Recommendations to enhance ESHS Management at MEH CE for the program

114. Recommendations to enhance ESHS management for MEH CE are similar to those for ONE (see above), although on a much smaller scale:

- Establish a dedicated ESHS budget and logistical support for CE-MEH, including financing for field monitoring and supervision activities under the Program
- Strengthening institutional capacity through formalization of staffing arrangements, targeted training on PforR ESHS requirements, and adoption of internal HR and labor management policies
- Improve social risk management frameworks, including clearer guidance on land acquisition and resettlement, that is, aligned with World Bank ESS5 standards, and explicit consideration of vulnerable groups in ESHS oversight
- Develop a basic stakeholder engagement and communication framework aligned with the Program, clarifying MEH's role vis-à-vis promoters and local authorities
- Set up a formal grievance redress mechanism within MEH, including complaint registration, tracking, reporting, awareness-raising, and an internal committee for workplace grievances

6.2 Occupational Safety and Health

Policy and Legislative Framework Support

115. OSH in Madagascar is governed by Law No. 94-027 on the Code of Hygiene, Safety, and the Working Environment (1994), which was eventually followed by Law No. 2003-044 of June 10, 2004 (the Labor Code). The Labor Code contains general and specific provisions applicable to employment contracts, working conditions, health, safety, and the working environment, labor relations, vocational training, and labor disputes. With regard to safety, health, and environmental conditions, it defines the employer's obligation to provide adequate equipment and clothing to protect the life and health of workers, both collectively and individually, against risks inherent in the work and against HIV/AIDS in the workplace, as well as to prevent risks related to work, facilities, equipment, and work materials are subject to mandatory safety standards.

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116. In the Malagasy system, the Directorate of Social Security for Workers (DSST), within the Ministry of Labor, Employment, Civil Service, and Social Laws (MTEFPLS), and the regional labor directorates (DRT) are the main entities responsible for OSH. The DSST ensures compliance with and development of OSH and workers' social security standards, coordinates and monitors the missions and activities of the occupational health services (SST) and maintains a database of occupational accidents and occupational diseases recorded by the SST. The DRTs, for their part, carry out labor inspection missions, i.e., advisory, monitoring, and conciliation missions, and ensure compliance with workplace standards. In addition, the National Social Security Fund (CNaPS) provides coverage and compensation for workers who are victims of occupational accidents and diseases, while the Occupational Health Services (SST) are prevention and care organizations for workers and their families.

117. In fulfilment of its responsibility of identifying hazards at workplaces and assessment of risks with a view of preventing accidents, diseases and damage to property, DSST will play a key role in the program by inspecting and auditing of workplaces to promote best practices and ensure compliance with safety and health standards as set out in the laws cited above and other subsidiary legislation.

Institutional Capacity and Resources

118. The department has offices in major industrial cities and towns in the country. The officers at these zones may not possess the requisite skills necessary for managing health and safety risks. Furthermore, the offices are understaffed, with the capacity assessment findings revealing that most officers are not able to cover their regions within the zones as required. The officers are also not given enough resources (including budget) to cover the wide regions assigned. This has made it difficult for the staff to enforce and monitor the health and safety requirements as per the OHSA and other relevant Acts and legislations, especially for infrastructure projects.

Challenges at DSST/DRTs on OSH Management

119. In 2020, the ILO conducted a comprehensive assessment of OSH standards in Madagascar, revealing significant gaps between Malagasy legislation and the international standards outlined in ILO Conventions C155, C161, and C187. The key findings of the study were as follows:

- Absence of National Policies and Programs: The lack of national policies and programs dedicated to occupational safety and health (OSH) limits the ability to define clear frameworks and develop coordinated plans to improve working conditions and protect workers from occupational hazards.
- Outdated OSH Regulations: The absence of specific, up-to-date OSH regulations, with references in some cases over 50 years old, impedes effective protection of workers, especially in the context of emerging risks.
- Insufficient Support Services: There are no provisions for establishing an information and advisory service on workplace safety and health, hindering the gradual improvement of working conditions, particularly in small businesses and the informal economy.
- Lack of Sector-Specific Risk Studies: No studies have been conducted on sector-specific risks or on employers' obligations regarding training, information dissemination, and risk assessment.

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- Limited Awareness Campaigns: There is a lack of awareness campaigns focusing on the prevention of occupational accidents and diseases. The system is primarily compensation-based, exposing workers to avoidable risks and recurrences.
- Unimplemented OSH Management Systems: Proposed provisions for modernizing OSH management systems remain unimplemented, creating a significant gap between theoretical frameworks and practical application.

120. These shortcomings were further exacerbated by a lack of human, material, and financial resources, which limited the capacity of the labour inspectorate and regulatory bodies to effectively enforce occupational safety and health standards. Additionally, the informal and seasonal nature of many jobs, coupled with the lack of awareness of regulations among both companies and workers, as well as insufficient OSH skills among key stakeholders, deepened these challenges.

121. Some of the challenges faced by the institute include but not limited to:

i. Overlap in legislative and other institutional mandates makes it difficult in the execution of some functions of DSST;
ii. Lack of presence in all the districts;
iii. Inadequate staffing levels at the district levels;
iv. High turnover of professional staff in OSH institutions
v. Poor coordination with other MDAs on OSH monitoring and supervision;
vi. Inadequate allocation of financial resources and provision of other resources such as vehicles, office space, specialized surveillance equipment, vehicles, protective equipment;
vii. Lack of continuous professional development of its technical staff; and
viii. Lack of information management system to collect and collate OHS data and statistics for policy and decision making.

Recommendations to enhance Occupational Health and Safety Management

i. Integrate DSST and DRTs early into the program planning process, including participating in the screening of health and safety risks for the sub-projects.
ii. Deliver OHS capacity building with DSST for agencies and contractors;
iii. Establish DSST–DRT coordination/convention for OHS monitoring to augment monitoring of program activities; and
iv. The ESHSM manual shall include guidelines on OSH to be adopted by the implementing agencies and contractors for the program's activities

6.3 Social Management Systems

122. MECIE Article 153 specifies that developers and relevant ministerial departments are required to consider and address in the ESIA, PREES, and EESS the risks associated with social issues, including:

- Any form of gender-based physical or psychological violence, including abuse, harassment, discrimination, and sexual violence;
- Failure to comply with decent working and employment conditions, taking into account fair and equitable remuneration and regulated working hours;
- Child labor that does not comply with legal provisions;
- Forced or compulsory labor;
- Risks related to occupational health and safety. As such, they must implement measures to prevent occupational accidents and health hazards resulting from, related to, or occurring

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during work, by minimizing the cause of risks inherent in the workplace, to the extent that this is reasonable and practically feasible.

- Direct or indirect discrimination based on gender, origin, age, religion, disability, or any other characteristic protected by law;
- Opportunities to formalize informal jobs or improve the conditions of workers in this sector by offering them social rights and better access to protection services;
- Support for the living conditions of migrant workers by helping them access health and safety services;
- Freedom of association and collective bargaining;
- Respect for the customary land rights of local communities;
- Access to essential natural resources such as water, arable land, forests, and fishing grounds;
- Gender, taking into account the differentiated impacts on women in terms of employment, health, participation in decision-making, and access to resources;
- Culture and heritage, such as respect for historical, cultural, and archaeological sites;
- Grievance management.

Challenges to Social Risk Management

61. Some of the challenges include but not limited to:

i. Capacity building of community development committees through enhancing their skills to manage social risks at the local levels, including GBV training
ii. Inadequate allocation of financial resources and provision of other resources such as mobility allowances to properly execute its mandate
iii. Poor coordination with other MDAs leading to waste of resources and duplication of activities

Recommendations to enhance Social Risk Management

i. The ESHSM manual shall include guidelines to be adopted by the implementing agencies and contractors for the program's activities. MEH will consult with the Gender - related departments on the developed guidelines for concurrence.
ii. Integrate the Gender Division early into the program planning process, including participating in the screening of social risks for the sub-projects.
iii. Collaborate with the division and directorates to carry out capacity building through training to the program's implementation agencies, and contractors' workers on social risks, especially on GBV
iv. Collaborate with the Gender division offices at the district levels to supervise and monitor issues related to contractors' workers, especially GBV and other social risks for compliance
v. Integrate social risk management in the planning process, to assist in subproject identification that will have the greatest impact in improvement of the social, economic and cultural conditions of the communities for sustainability, poverty reduction and national development.
vi. Collaborate and utilize extensive networks at the local levels to carry out stakeholder mapping, mobilization and engagement;
vii. Utilize existing GRM systems set for proposed PforR program;
viii. Collaborate with offices at the local levels to supervise and monitor issues related to community concerns, contractors' workers, especially GBV and other social risks for compliance

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Recommendations to enhance Social Risk Management

123. The following sections provide further details on specific social management systems.

Gender

124. In Madagascar, the responsibility for gender equality, women's empowerment, and protection of vulnerable groups is vested in the Ministry of Population and Solidarity (or its successor institutional arrangement). The Ministry is mandated to formulate, coordinate, and oversee the implementation of national policies related to gender equality, social protection, and the promotion of women's rights, in collaboration with line ministries, decentralized authorities, and development partners. Its mandate includes addressing structural gender inequalities, strengthening social inclusion, and supporting national efforts to prevent and respond to Gender-Based Violence (GBV).

125. The Ministry plays a central role in the formulation and implementation of national gender and social protection policies, including initiatives aimed at improving the socio-economic status of women and vulnerable populations. Its functions include gender mainstreaming across government programs, coordination of GBV prevention and response mechanisms, promotion of gender equity and equality, and support to community-based and institutional interventions targeting women, children, and other at-risk groups. Through these functions, the Ministry contributes to creating an enabling policy and institutional environment for gender-responsive development.

126. Within its institutional structure, directorates and technical services are responsible for women's rights and protection, social protection, and gender mainstreaming, including coordination with decentralized territorial authorities at regional and communal levels. These entities support the integration of gender considerations into sector programs and local development planning, and facilitate collaboration with civil society organizations and service providers involved in GBV prevention and response.

127. In the context of ASCENT Madagascar, the Ministry is relevant for supporting the mainstreaming of gender and social inclusion across Program activities, particularly in relation to access to electricity services for women, vulnerable households, and underserved communities. The Ministry's mandate and institutional presence provide a foundation for collaboration with energy sector institutions to help identify, mitigate, and monitor potential gender-related and GBV risks associated with infrastructure deployment, community engagement, and labor influx.

Summary of challenges for gender management

128. Some of the challenges faced include but not limited to:

i. Lack of representation in all the districts;
ii. Lack of technical skills with the limited staff;
iii. Lack of presence in all the districts;
iv. Poor coordination with other MDAs on gender mainstreaming and monitoring, GBV cases, etc;
v. Inadequate allocation of financial resources and provision of other resources such as vehicles and office space to properly execute its mandate;

Recommendations to enhance management of gender issues

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- Institutionalize gender mainstreaming across ASCENT implementation agencies by formally involving the Ministry in charge of Gender (MPS) in program implementation arrangements, including technical guidance on inclusion, GBV risk screening, and monitoring of gender-related outcomes.
- Integrate gender-responsive measures into clean cooking and energy access activities, ensuring that targeting criteria, subsidy mechanisms, and communication strategies explicitly consider women, female-headed households, and vulnerable groups, particularly for clean cooking DLIs.
- Strengthen gender-sensitive grievance and risk management systems, including accessible grievance channels for women, referral pathways for GBV-related complaints, and basic capacity building for implementing agencies on gender and social inclusion under PforR Core Principles.

Involuntary resettlement

129. Madagascar's national legislation on involuntary resettlement and World Bank requirements are not always consistent. Ordinance 62-023 and its implementing decrees contains discrepancies with regard to World Bank requirements, particularly with regard to compensation alternatives, disputes, vulnerable groups, participation, relocation, economic rehabilitation, monitoring and evaluation, complaint management, consultations, resettlement costs, etc.

130. Decree No. 2021-689 amends and supplements Decree No. 63-030 of 1963 concerning expropriation for public use and the amicable acquisition of real estate by the State. It defines the terms and conditions for the application of Article 46 of Ordinance No. 62-023, establishing the procedures for the payment of compensation to presumed owners and the conditions for proving their status. An Administrative Commission for the Payment of Presumed Owners is also created to validate the lists of compensation beneficiaries.

131. Malagasy legislation recognizes formal and informal occupants. Both categories of persons are eligible. Article 18 of State Property Law No. 2006-031 of November 24, 2006, recognizes the development and Law No. 2005-019 establishing PPNT (Propriété Privée Non Titrée, or untitled private property) of land without status or belonging to the private domain of public entities, or even the public domain.

132. Article 33 of Law No. 2005-019 on the land tenure system in Madagascar defines untitled land as all land, both urban and rural, on which land tenure arrangements are exercised in the form of personal or collective, real, evident and permanent, according to the customs of the time and place and according to the purpose of the land, which are likely to be recognized as property rights by a land title deed.

133. The law remains uncompromising towards illegal occupants of private land. Persons who have no legal or other rights that can be recognized on the land they occupy and who are not included in the two categories described above. These are known as irregular or illegal occupants.

134. While remaining flexible, the Malagasy legislative and regulatory framework specifies a deadline for the inventory of property and assets affected by an investment project, the rights holders of which will be eligible for compensation. Although the DUP decree (or the transfer order issued within one year) establishes the “final plan,” the law allows affected persons to come forward up to one month after the publication of the expropriation order issued by the judge. Furthermore, Order No. 62-023 stipulates that development is prohibited from the date of publication of the public utility decree or for a maximum period of one year. The right to compensation and assistance exclude those populations who settle in the area after the decision to carry out the project and the compilation of the census of populations eligible for resettlement and other compensation.

135. For the ASCENT PforR, the World Bank policy recommending an eligibility deadline will be applied, not necessarily that of the start of the census, but according to a schedule to be defined by the Borrower and accepted by the lender. It should be noted that it is essential to consider the

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occupancy status on the deadline date, which provides robust references for handling any claims in relation to the cut-off date.

136. According to national legislation, compensation is calculated on the current value of the property, whereas for the WB, the property must be valued at replacement cost according to the current market price. The WB policy will be applied because it better protects the PAP against the risks of impoverishment.

Summary of challenges for management of involuntary resettlement

137. The mains points are conclusion from the consultation with the DOE as well as the Madagascar overview assessment against ESS5 conducted by the World Bank in 2025

i. Procedural delays and administrative complexity: Expropriation and compensation processes are lengthy and fragmented across multiple institutions, with frequent staff turnover and no standardized procedures, leading to delays between declaration of public utility (DUP) and effective payment to PAPs.
ii. Gap between national law and ESS5 on compensation sequencing: National procedures allow possession of land after the expropriation order, while in practice compensation is often paid long after works begin, contrary to the ESS5 principle of prior and effective compensation.
iii. Land tenure insecurity and documentation issues: A large share of PAPs lack formal titles or have incomplete, degraded, or disputed records ("boky rovitra"), complicating eligibility determination and delaying compensation.
iv. Limited livelihood restoration and vulnerability focus: The national framework emphasizes compensation for direct material loss only, with no explicit objective to restore or improve livelihoods, and weak provisions for women, informal occupants, and other vulnerable groups.
v. Weak grievance, monitoring, and post-resettlement evaluation systems: Grievance mechanisms are mainly judicial and activated late; there is no systematic monitoring of PAR implementation, limited post-resettlement evaluation, and rare use of independent audits.

Recommendations to enhance management of involuntary resettlement

- Ensure effective payment of PAPs and resettlement assistance occur before wayleave acquisition
- Develop and apply a national procedures manual for land acquisition and resettlement (standard forms, timelines, responsibilities), and prioritize amicable acquisition over systematic resort to DUP.
- Integrate land tenure regularization measures within projects (support for documentation, inheritance regularization, certification) to reduce delays and disputes during compensation.
- Institutionalize livelihood restoration and vulnerability measures: include livelihood restoration programs, targeted assistance for women and vulnerable PAPs, and greater use of in-kind compensation (land-for-land, housing) where appropriate.
- Strengthen and/or establish early, accessible GRMs (before judicial recourse), reinforce social monitoring throughout PAR implementation, and mandate independent completion audits for projects with significant resettlement impacts.

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7 Environmental, Social, Health and Safety Systems Assessment in Relation to the PforR Core Principles and Planning Elements

138. This chapter summarizes the operational performance, and capacity of institutions mandated to manage ESHS risks and impacts associated with the Program interventions. The assessment, which is based primarily on government stakeholder consultations conducted in February 2026, has analysed the defined national systems with the aim of confirming their consistency with the PforR financing Core Principles and Key Planning Elements. as defined in policies, legal and regulatory framework, procedures, guidelines and consistency with the core principles and key planning elements of PforR financing.

139. The summary discusses the applicability of the six core principles in terms of strength, weakness, opportunities, and threats/risks (SWOT) with respect to the policy and legal framework, institutional context and existing environment and social management system. The Approach applied entails:

i. An analysis of the strengths of the existing ESHS system, as it functions effectively and efficiently and it's consistent with Bank Policy and Directive for Program-for-Results Financing.
ii. Identification of system weaknesses, capacity constraints and gaps in the existing national and district levels. Considering the inconsistencies and gaps with the Bank Policy and Directive for Program-for-Results Financing.
iii. Identification of opportunities and key actions to strengthen the existing system to ensure environmental and social soundness and long-term sustainability in line with the design, construction, and operation phases of Program interventions.
iv. System and capacity assessments that identified gaps and opportunities which informed the Program design recommendations and Program Action Plan (PAP) for enhanced ESHS management

140. From the ESSA findings, it is evident that the national system is comprehensive and adequate for the management of many ESHS aspects, and is, overall, materially consistent with the Six PforR Core principles. However, gaps have been noted in ESHS management system both as written and as being implemented by REA, and the other relevant MDAs. The gaps are a potential risk to the effective management of program ESHS effects, and will need to be strengthened to enable MEH to effectively manage these potential risks of the proposed program. Table 7-1-1 below provides a detailed comparative analysis of the national system against the Six PforR Core principles. The analysis has incorporated the findings of the ESSA stakeholder consultations conducted for the program.

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Table 7-1: ESSA Findings against the six Core Principles

<table>
<tr><th colspan="2">Core Principle 1: General Principle of Environment and Social Management</th></tr>
<tr><td colspan="2">Bank Policy for Program-for-Results Financing: Environmental and social management procedures and processes are designed to:
a) promote environmental and social sustainability in Program design.
b) avoid, minimize, or mitigate against adverse impacts; and
c) promote informed decision-making relating to a program's environmental and social effects.</td></tr>
<tr><td colspan="2">Bank Directive for Program-for-Results Financing: Program procedures will:

a) Operate within an adequate legal and regulatory framework to guide environmental and social impact assessments at the program level.
b) Incorporate recognized elements of environmental and social assessment good practice, including:
• early screening of potential effects of all projects.
• consideration of strategic, technical, and site alternatives (including the "no action" alternative).
• explicit assessment of potential induced, cumulative, and trans-boundary impacts.
• identification of measures to mitigate adverse environmental or social impacts that cannot be otherwise avoided or minimized.
• clear articulation of institutional responsibilities and resources to support implementation of plans.
• Responsiveness and accountability through stakeholder consultation, timely dissemination of program information, and
• responsive grievance redress measures.</td></tr>
<tr><td colspan="2">Applicability: Applicable
Core Principle 1 is considered relevant and fully applicable in terms of environmental, health and social (EHS) for the Program.
Investments to be undertaken under RA 1, 4 and 5 of the program will range from small to large scale infrastructures, such as rehabilitation, expansion, and/or construction of new transmission/distribution network, new grid connections toward universal access, and climate resilient infrastructure, among others. Implementation of these types of investments are likely to have a physical footprint with varying degree of ESHS risks and impacts during the lifecycle of the investments (construction, operation, and maintenance, and during decommissioning phases). Although expected to be localized, manageable and in some cases temporal, these risks and impacts will require mitigation. This therefore requires undertaking ESHS assessment and providing appropriate mitigation measures to adverse risks and impacts.

Potential impacts will include (but not limited to) solid and liquid waste generation from project activities, destruction of crops, vegetation and trees to pave way for construction of LV lines, occupational and community health and safety risks associated with civil and electrical works, elite capture limiting appropriate targeting of last mile connectivity, risks associated with wayleave acquisition for transmission/distribution lines without compensations, land acquisition for construction of the new sub-stations, SEA-H and GBV risks to communities from project workers; exclusion of vulnerable groups and vulnerable households and individuals from electricity access due socio economic barriers, among others.

Program-related activities will, therefore, be required to undertake environmental, social, health and Safety (ESHS) assessments, and to provide and implement appropriate measures to mitigate adverse risks and impacts.</td></tr>
<tr><td>STRENGTHS
• The national system provides a comprehensive framework for environmental screening, impact assessment, and management consistent with the core principles outlined in Program for Results Financing. However, it is weak in social screening and assessment.
• Existing legislation also helps minimize or mitigate possible adverse impacts on natural habitats, archaeological sites, and cultural resources.</td><td>WEAKNESSES
• The implementation of the existing legal/regulatory provisions related to development project ESHS management faces challenges due to lack of adequate and qualified staff with the right skill set within MEH and other MDAs to manage E&S risks.
• The National EIA system mainly focuses on environmental aspects and does not comprehensively cover the social, health and safety issues such as on labour, occupational/community health and safety, land management, GBV, SEA-H among others</td></tr>
</table>

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• The country has developed policies and legislation on public participation and social development. • There is also a well-defined policy framework to enhance transparency with regard to development projects, including requirements that all ESIAs and PREES have to go through public participation and access to environmental information. • The MECIE and associated Regulations, as well as the national EIA Guidelines stipulate guidelines for conducting EIAs, audits, and field study and outline the structure of ESIAs and Audit reports. The legislation also explicitly outlines the legal consequences of partial or non-compliance to the provisions of MECIE. • ONE has GRM channels through letters, verbal complaint, social media and internet, MEDIA, email • • MEH, ONE, JIRAMA and ADER have all had experience with ESHS management on similar activites, especially with regard to the World Bank-funded LEAD and DECIM projects. • ADER implements feasibility studies, in which E&S screening is undertaken. The latter is implemented in collaboration with ONE or the MEH CE. This is followed by development of an ESIA/ESMP or PREES by the project developer. E&S experts within ADER's Study and Research Service are responsible for assuring project ESHS risk evaluation and mitigation. Note: ADER uses the app GeoSIM to optimize technical-economic choice of electrification options, prioritize target areas, and ensure transparency. ESHS issues do not appear to be taken into consideration. JIRAMA indicated that the national legal and regulatory ESHS requirements (embodied by MECIE) are incorporated into project screening, and that E&S management measures are adapted with respect to project implementation. • JIRAMA's QHSE Directorate (quality, health, safety and environment) is in operationnal with skilled personnel meant to manage ESHS issues related to JIRAMA development projects. •	• The implementing Agencies lack enough and qualified human capacity to support Environmental and Social Management Systems (ESMS) of the Program. • The social risk management (SRM) systems are not well defined, developed, and coordinated. Relevant SRM laws are fragmented across different ministries and departments which makes implementation of social risks management difficult to coordinate. • Insufficient capacity building activities on implementing agency, regional organizational structures, and regional environmental and social officers to ensure compliance to required environmental and social standards during project implementation • There is general appreciation on the need to undertake stakeholder consultations during the inception, preparation, implementation, and operational phases of the project. However, EIA public participation forums do not target the relevant stakeholders and therefore do not capture significant environmental and social risks and impacts. Meaningful public participation is not attained as there are gaps on public consultation notices, allocated duration, documentation, and feedback to the public of scheduled sessions. Nonetheless, a local 'electricity committee' composed of local authorities and local community members representing the interests of the intended electricity users. These committees also contribute to conflict avoidance. The committees support engagement of households, access for ADER, and other requirements for project implementation. • Project proponents have prioritized budgets to implement physical projects and to obtain a ONE license, with little or no allocation of budget for ESMP implementation unless it is a donor-funded project. ONE is unable to enforce project proponent ESMP budgets. • There is limited involvement of ESHS staff during project design, which result to challenges in accessing funds for stakeholder engagement, implementation and monitoring of ESMP and RAP due to capacity (competence and adequacy) and financial constraints. • Lack of integrating ESHS clauses as part of the bidding/contract documents makes it difficult to enhance compliance during project implementation by implementing agencies. • Weak multi-sectoral coordination and collaboration with key MDAs such as ONE, DSSTetc. useful in providing technical advice and monitoring of ESHS risks in investments. • As per the stakeholder consultation, low (that is, inadequate) budget allocation and other resources oversight at authorities such as MEH, ONE, JIRAMA, ADER and etc. at the national level and regional and local governments authorities) for Environmental and Social management leading to poor compliance with ESHS requirements. • Poor compliance with national environmental regulations and good practices in ESHS (relevant required administrative authorization, occupational health and safety, social risk management, waste management, including e-waste management), especially in rural areas. These weaknesses are related to less than adequate capacity at the local level (due to lack of human resources and inadequate budget) as staffs are based only in Antananarivo. • There are no existing GRM systems at the implementing agencies. Local authorities are expected to manage complaints by project-affected persons or groups. This includes

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	SEA/SH/GBV complaints whereas segregation of sensitive case must be ensured for safety reason. • Implementing agencies do not have previous experience in Implementing PforR projects • There is weak management of the social aspects of infrastructure projects, as anticipated by Core Principle 1, including the management of anticipated E&S risks under the Program, and such risks are not adequately captured in ESIA reports. • No mechanisms exist for such development projects to prevent or address SEA/SH. JIRAMA lacks policies for preventing exclusion of vulnerable groups, gender-related risks, or ensuring stakeholder engagement and consultation. • Poor implementation or mainstreaming of existing ESHS risk management regulations in program guidelines. • Limited supervision, monitoring and reporting on ESHS risk management impeding identification and execution of corrective action plans. •
OPPORTUNITIES • The implementing ASCENT PforR partners will develop ESHS Management Systems for use in the program (and future projects) which will include a screening checklist for enhanced identification of potential ESHS risks and impacts and risk categorization • The ASCENT program will assist the LAs in development of appropriate guidelines, screening checklists, technical options, and manuals to ensure compliance with the national environment and social legislation for the Program. • The program will enhance the ESHS clauses in the contract and bidding documents to ensure key issues are comprehensively included. Contractors will be required to ensure they have qualified ESHS personnel, comply with site specific ESMPs prepared for the sub-projects and integrate the E&S license conditions under MECIE decree, including labor condition, health and safety aspects in contract management. • The Program will partner with ONE, DSST, and other relevant agencies to enhance the capacity of the Implementing agencies on the environmental, social, and health risks' management based on national laws and regulations such as training and capacity building of E&S officers on the MECIE, Gender, OHSA, and GBV regulations, and monitoring of investments and enforcements. • The program will allocate adequate budget and resources for ESHS management such as stakeholder engagement, grievance management, environmental, social, health and safety assessments and monitoring during early project planning stages. • To improve ESHS documentation, monitoring and reporting, a template should be developed as part of the ESHS management manual. • To improve ESHS monitoring, provide adequate logistical support to E&S officers at MEH and deepen collaboration with other agencies to enhance ESHS compliance monitoring of works site. This can be achieved through organized joint field visits and capacity building on ESHS aspects. • Develop guidelines on stakeholder engagement for enhanced targeting, inclusion, consultation, and feedback mechanism. Public consultations should be comprehensive to include i) description	**THREATS/RISKS** • Likely Political interference in decision-making on budgets, investment priorities, operationalization of ESHS risk management plans, and compliance. • Worksite Hazards and Accidents: Construction organizations face threats from worksite hazards, accidents, and emergencies, which pose risks to worker safety and project continuity. • Construction projects are subject to budget constraints, cost pressures, and client demands for cost-effective solutions. Budget cuts, resource limitations, and value engineering practices may compromise safety investments, training programs, and safety equipment procurement, leading to safety risks and compromises. • Construction organizations experience workforce shortages and skill gaps due to factors such as aging workforce, labor market fluctuations, and insufficient training pipelines. Recruiting qualified workers, retaining experienced talent, and addressing skill shortages pose challenges for maintaining safety standards and project continuity. • Infectious diseases, such as pandemics and outbreaks, that pose significant occupational health and safety risks to healthcare workers. Managing outbreaks requires rapid response, infection control measures, and adequate personal protective equipment supply to protect frontline workers. • Weak waste management infrastructure in Madagascar. Budget considerations at JIRAMA mean that outside of World Bank funding, there is little likelihood that the goal of connecting 1.5 million people (about 300,000 households) will be achieved.

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of site conditions versus project design considerations; ii) project affected persons (PAP) and beneficiaries; iii) checklist to show the level of participation, and iv) feedback incorporated in project designs. • Develop and roll-out GRM guidelines at MEH i) that will be functional and operational; ii) incorporate a GBV referral pathway and referral system hotline to addressing GBV/SEAH issues; iii) Ensure the GRM is gender responsive and accessible to all persons, iv) have a comprehensive system for documenting grievances with feedback mechanisms in place; v) create awareness to the public on the GRM uptake channels and systems; vi) assign a GRM focal person, vii) have a functional and well represented GRM committee, and viii) Build capacity of the GRM focal persons on the mechanism, structure, logging and feedback. •	**LEVEL OF RISK - SIGNIFICANT**

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Core Principle 2: Natural Habitats and Physical Cultural Resources

Program E&S management systems are designed to avoid, minimize, or mitigate adverse impacts on natural habitats and physical cultural resources (PCR) resulting from the Program. Program activities that involve the significant conversion or degradation of critical natural habitats or critical physical cultural heritage are not eligible for PforR financing

Bank Directive for Program-for-Results Financing: Program procedures will:

a. Include appropriate measures for early identification and screening of potentially important biodiversity and cultural resource areas.
b. Support and promote the conservation, maintenance, and rehabilitation of natural habitats; avoids the significant conversion or degradation of critical natural habitats, and if avoiding the significant conversion of natural habitats is not technically feasible, includes measures to mitigate or offset impacts or program activities.
c. Take into account potential adverse effects on physical cultural property and as warranted, provides adequate measures to avoid, minimize, or mitigate such effects.

Applicability: Applicable

i. The provisions in Core Principle 2 are considered as part of the ESIA process analyzed under Core Principle 1.
ii. Core Principle 2 is applicable to the Program due to potential destruction of natural vegetation and disturbance of unknown physical cultural resources (e.g. graves) during implementation of interventions such as i) construction and rehabilitation of transmission/distribution lines and substations (RA1); ii) rehabilitation of distribution lines and connecting new households and businesses, iii) installation of renewable electricity generation capacity (RA4).
iii. Potential risks/impacts may include destruction of crops, vegetation and trees to pave way for construction of transmission/distribution lines, destruction of physical cultural resources of value to target communities that may contribute to increased social conflicts

NB: The Program will not support activities that will either impact or convert critical natural habitats or physical cultural resources.

STRENGTHS

- The ESIA regulations incorporate the program design and implementation of appropriate measures to minimize or mitigate possible adverse impacts on the natural habitats, archaeological sites, and cultural resources, with involvement from strong institutions such as ONE and Ministry of Communication and Culture. Article 4 (i) of the EIA regulations require that EIAs consider biodiversity and natural lands
- Article 24 of EMA Act (2011) gives the Minister may declare an area of land which is ecologically fragile or sensitive to be an Environmentally Protected Area

Cultural Heritages

- MECIE requires that Project Briefs be prepared for projects located in or near areas of cultural or religious significance.
- The existing legislation for the Malagasy ESIA process considers physical cultural heritages, includes screening for archaeological, historical, and cultural sites to ensure environmental and social sustainability.
- ... defines national monuments, provides a list of the main monuments, and defines measures for their protection.
- Program will exclude sub-projects that have adverse impacts on natural habitats and physical cultural resources

WEAKNESSES

The weaknesses identified for Core Principle # 1 apply to Core Principle # 2.

Other weaknesses include:

- Physical cultural heritage sites are not well documented or exhaustively mapped out at national and LA levels.
- Weak enforcement of civil contracts and laxity in monitoring damage to critical habitats, endangered species, and PCRs during construction.
- Weak staff capacity to assess and monitor the potential impacts on natural habitats and physical cultural resources through intense assessment of critical habitats and endangered species, especially in water catchment areas, due to inadequate technical capacity and allocation of financial resources.
- Limited collaboration between project proponents managing important ecosystems and physical cultural resources.

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OPPORTUNITIES	THREATS/RISKS
• Due to critical nature of some subprojects under the program (e.g. construction of transmission/distribution lines through forests), involve multisectoral agencies early in the project design (such as with ONE) to better identify and develop mitigation and compensation measures to manage the natural habitats and physical cultural resources during project implementation. • Strengthen the screening procedures to include a checklist to assess whether a subproject has the potential for disturbing and affecting a known cultural or religious site • Allocate sufficient budget and resources for the identification and management of natural habitats and PCRs. • Improve the level of awareness on safeguarding endangered/threatened natural habitats, climate change and PCRs during stakeholder and public participation	Budgets necessary for the protection of the critical habitats and PCRs are inadequate or unavailable, which may result in high risk of destruction/degradation of the same. Limited engagement and coordination of relevant institutions with mandate in management of natural habitats to provide necessary technical support in management of E&S risks relating to such resources. At ONE there is no permanent institutional program dedicated to systematic sensibilization of communities to problems related to pollution (noise, air, water), waste management, and efficient energy (and other) technologies or specifically renewable energy. ONE's current role is as a regulatory authority engaged in evaluation and enforcement of E&S management; this limits ONE's role in terms of community engagement. ONE does not have a specific role in guaranteeing including inclusion of vulnerable communities, groups or persons, especially in terms of information-education-communication (IEC) programs. The latter is left to project sponsors. Nonetheless, ONE does get involved in communities vis-à-vis the ESHS management linked to development projects. **LEVEL OF RISK – MODERATE**

Core Principle # 3: Public and Worker Safety
Program ESHS management systems are designed to protect public and worker safety against the potential risks associated with: a) the construction and/or operation of facilities or other operational practices under the Program; b) exposure to toxic chemicals, hazardous wastes, and otherwise dangerous materials under the Program; and c) reconstruction or rehabilitation of infrastructure located in areas prone to natural hazards.
Bank Directive for Program-for-Results Financing: Program procedures will: • Promotes community, individual, and worker health, safety, and security through the safe design, construction, operation, and maintenance of program activities; or, in carrying out activities that may be dependent on existing infrastructure, incorporate safety measures, inspections, or remedial works as appropriate. • Promote measures to address child and forced labor. • Promote the use of recognized good practice in the production, management, storage, transport, and disposal of hazardous materials generated under the program activities. • Promotes the use of integrated pest management practices to manage or reduce pests or disease vectors, and provides training for workers involved in production, procurement, storage, transport, use, and disposal of hazardous chemicals in accordance with international guidelines and conventions. • Include adequate measures to avoid, minimize, or mitigate community, individual, and worker risks when the program activities are in areas prone to natural hazards such as floods, hurricanes, earthquakes, or other severe weather or climate events.
Applicability: Applicable The provisions in Core Principle 3 are considered as part of the PREES process analyzed under Core Principle 1. Public and worker safety could result under risk through: i. Construction, rehabilitation and operation of transmission/distribution lines, construction of substations, and connecting new households. These activities can expose the public and workers to risks such as dust, noise, and air pollution; solid and liquid waste generation; hazardous and noxious wastes from equipment and machinery used. ii. Transformer and backup generator equipment may potentially contain used oils, that can pollute water and soils, while cooling equipment may contain refrigerants (potential Ozone Depleting Substances, ODSs).(Note: Polychlorinated biphenyls, or PCBs, will not be used in relation to these ASCENT PforR activities)

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iii. Improper and indiscriminate disposal of solid, liquid and e-waste,
iv. The risk of GBV, especially SEA-SH amongst project workers and between workers and communities resulting from the influx of workers into sub-project areas:
v. The expansion of electricity to last-mile consumers may increase unsafe electricity utilization through, e.g., illegal connections.
vi. Child labour; and
vii. and the spread of communicable diseases such as HIV/AIDS, STDs, among others

STRENGTHS	**WEAKNESSES**
• The country has legal statutes and provisions to protect the workers such as the Law 94-027 which provides the national legal baseline for Labor and Working Conditions. It governs occupational health and safety requirements for contractors, subcontractors, and workers involved in energy infrastructure, clean cooking, grid extension, mini-grids, and off-grid installations..... • MECIE and related regulations contain robust procedures and requirement for worker health and safety, requiring plans for accident prevention as well for health and safety of workers and communities, which are also part of contracts for civil works. • Consultation with the Ministry of Labor, Employment and Public Function (MLEPF), General Directorate for the Promotion of Employment, indicated that the government actively support gender equality and non-discrimination as well as protection of vulnerable groups in relation to employment policy. • The Government's standard contract conditions for contractors include provisions for public and worker safety (for example, regulations on the use of explosives, provision of barricades at the construction site, use of personal protection gear by workers, disposal of construction debris and wastewater, preventing the creation of conditions conducive to disease vectors, etc.). • The country systems have guidelines/regulations on aspects concerning the management of construction sites, including public and worker safety risks from construction/operation of facilities. • Law no. 2015-003, the updated Malagasy Environment Charter, is a framework law setting out the fundamental rules and principles for the management of the Environment. It defines the principles, the general framework for environmental actors and development actors, principles and strategic orientations of the country's environmental policy and includes provisions on promotion of efficient waste management systems for agricultural, industrial, household and hazardous waste. The Gender promotion directorate under the Ministry of Population has developed GBV referral pathways across the country with toll-free numbers and digitized GBV Dashboard to monitor GBV cases. • MECIE call for a Grievance Redress Mechanism (GRM) for development projects. • Adoption of key ILO provisions.	• The National ESIA system (as defined by MECIE) does not adequately cover aspects on public and worker's health and safety. This results in ESIAs/ESMPs that do not broadly incorporate the health and safety requirements and mitigation measures. Aspects of community/public heath are not covered adequately as well. • Limited awareness, capacity, and enforcement of the relevant provisions at the national and district level for addressing community health and safety risks and impacts related to construction sites such as environmental pollution, labour influx risks (GBV- SEAH, spread of HIV/AIDs and communicable diseases). • Limited human and financial resources allocation to DSST staff at the district levels, resulting to poor supervision of infrastructure projects to ensure compliance to required national standards as per the some provinces do not have DSST representatives • Limited capacity in technical personnel, safety equipment provision, and poor budget allocation by contractors to comply with national requirements and international good practices • Poor collaboration and coordination among the various implementing agencies, especially DSST and Public Health departments, in addressing occupational health and safety related issues, because they are rarely involved in providing health and safety oversight at the construction, resulting in inadequate attention to OSH and public safety concerns. • There is a general lack of awareness for workers on health and safety issues, particularly concerning exposure to workplace safety hazards aspects in hazard-prone areas, etc. • Weak workers grievance redress mechanism which fails to address workers complains and concerns on occupational safety and health. • There are weak structures of disposal of hazardous wastes, especially Asbestos, and e-waste, and capacity in the private sector is limited to dispose such waste • There is a lack of GRM at any level. Although the Malagasy labor legal and regulatory framework in general corresponds to the requirements of World Bank ESF ESS2, there are a few gaps that must be addressed, including: (i) legal and operational framework governing project workers (including community workers and standard worker contracts that reflect national and ESS5 requirements) ; (ii) implementation and monitoring of the implementation of measures (including the need for

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	regular inspections of work sites); (iii) lack of capacity-building programs and actions (including awareness of worker rights and familiarity with ESHD issues relevant to this PforR). 10
OPPORTUNITIES • Strengthening of MEH systems to manage OSH risks through inclusion of OSH policies in the ESMS • ESIA reports for sub-projects should cover public and workers health and safety requirements. • Partner with DSST to improve ESHS awareness and implementation/enforcement capacity through training and orientations of the MEH and contractors' workers • Identify and update the standard bidding and contracts documents to incorporate specific ESHS measures, including Contractor ESMP, worker's Code of Conduct, child and forced labour, labour practices, and budget allocation during project preparation, reporting protocols for proper implementation of ESHS. • Include appropriate requirements in civil works contracts and preparation of the required instruments of EHS management plans such as Waste Management Plan, Air, and Noise Pollution, among others. • Have in place a functional program and worker's grievance redress mechanism to handle workers conflicts including incorporating health and safety aspects. • Create awareness and sensitise contractors on legal prohibitions of GBV, and on use of forced and child labour and its implications. • Climate proofing the program infrastructure by conducting climate change screening on all proposed subprojects. • Work with relevant agencies in assessing and mapping out the natural disasters prone areas including areas prone to landslides, floods, lightning, etc.	**THREATS/RISKS** • Weak wate management system. • Systematic implementation of OSH provisions requires enhanced awareness in the key sector organizations and strengthened monitoring. • Improper management and limited enforcement of public and worker safety can result in physical injuries, including loss of life to the workers and public at and near construction sites. • Non-compliance by contractors on ESHS issues, and inaction by implementing relevant agencies to enforce contract ESHS clauses • Non-reporting of non-compliance, project-related accidents and fatalities by the implementing agencies / contractors • Inadequate resourcing of public health officers to sensitize communities and workers on health and safety concerns especially in working environments. • Illegal connections and vandalism of electricity infrastructure presents health and safety risk that may lead to electrocution. • Inadequate adherence by some contractors to employment regulations, such as providing written contracts to workers and an opportunity to air their concerns (worker grievances system). • Lack of accountability on disposal of e-waste after project completion. **LEVEL OF RISK – SIGNIFICANT**

Core Principle # 4: Land Acquisition
Bank Policy for Program-for-Results Financing: Program E&S systems manage land acquisition and loss of access to natural resources in a way that avoids or minimizes displacement and assists affected people in improving, or at the minimum restoring, their livelihoods and living standards
Bank Directive for Program-for-Results Financing: As relevant, the program to be supported: • Avoids or minimizes land acquisition and related adverse impacts. • Identifies and addresses economic and social impacts caused by land acquisition or loss of access to natural resources, including those affecting people who may lack full legal rights to assets or resources they use or occupy. • Provides compensation sufficient to purchase replacement assets of equivalent value and to meet any necessary transitional expenses paid prior to taking of land or restricting access. • Provides supplemental livelihood improvement or restoration measures if the taking of land causes loss of income-generating opportunity (e.g., loss of crop production or employment); and, • Restores or replaces public infrastructure and community services that may be adversely affected

10 See EVALUATION DU CADRE NATIONAL DE MADAGASCAR EN MATIERE DE GESTION DE RISQUES ENVIRONNEMENTAUX ET SOCIAUX : NES 2 Emploi et condition de travail.

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- (Program activities for which the borrower's land acquisition and resettlement (LAR) processes have significant gaps with this principle, or for which the borrower lack sufficient capacity to manage LAR impacts in a manner consistent with this principles, should not be considered eligible for the PforR Financing regardless of the number of people affected, unless supplemental arrangements are agreed with the Program authorities and endorsed by the CESSO, GSUSS, and/or the Regional Standard Advisor).

Applicability: Applicable

The activities outlined in the proposed Program will require wayleave acquisition for the transmission/distribution lines. This process will be conducted either through a willing buyer, willing seller approach where applicable, or through expropriation in cases where the land is expected to be owned by the Public Administration.

i. The construction of the lines may result in destruction of crops, vegetation and or/trees; potential loss of livelihood; devaluation of land and restriction in use of land following the acquisition of wayleaves to strengthen transmission/distribution network and to connect new households and businesses

STRENGTHS	**WEAKNESSES**
• Compulsory land acquisition processes are well defined in Malagasy Law. This process has put in place measures to protect the affected persons, defines affected persons consultation process and avenues for grievance redress. • ... The various agencies concerned by this PforR have past experience in undertaking wayleave acquisition, including land acquisition and compensation of structures, crops and trees. Note: Proposed asctivities that include significant resettlement will be excluded from consideration on this PforR. • Principle responsibility for land acquisition (including involuntary resettlement) lies with the DOE Directorate of Expropriation Operations within the MATSF. • There is a rough GRM system related to expropriation, but no details are available regarding the efficaciousness of this mechanism. • Strong legal mandate on expropriation and land acquisition: DOE is the competent authority for expropriation for public utility and has experience with multiple World Bank–financed projects involving physical resettlement. • Demonstrated ability to resolve complex land cases as being able to unblock even highly complex dossiers, including cases involving unclear or undocumented land ownership. • Clear focus on legal certainty and fraud prevention: DOE relies on official land acts and documentation to prevent usurpation and use of false claims during compensation processes. • Low volume of grievances: Complaints and oppositions are reported as rare (approximately 2 per 1,000 dossiers over the last 12 months)	• Key differences exist between national expropriation rules and World Bank requirements, notably on livelihood restoration, cut-off dates, and payment of compensation prior to works.11 • Legal frameworks do not explicitly stipulate provisions for livelihoods restoration as compensation is focused on land/assets replacement and relocation. There is no clear definition on the rights of those occupying public land and their entitlement, especially on livelihood restoration. • Weak capacities to ensure compliance to required national standards within the implementing agency and entities • Malagasy Law use depreciated replacement cost approach, which does not result in full replacement costs of the lost assets • The Law does not stipulate that resettlement should be avoided wherever possible; on the contrary, as long as a project is for the public interest, involuntary resettlement is considered to be inevitable • Lack of policy and legislation guidance on resettlement and livelihood restoration, including clear guidance on which should be the leading ministry/department on resettlement activities, and roles and mandates of different institutions/agencies • While the WB principle does entitle compensation for business losses, there are no legal provisions requiring the government to restore livelihoods or to provide assistance towards the restoration of such livelihoods. Land users such as tenant farmers are only entitled to compensation for crops (the valuation method is outlined in the 2001 Regulations). • Poor coordination with other agencies to manage social risks related to land acquisition and potential physical and/or economic displacement • Grievances are handled only at the Director/Secretary level and resolved exclusively through judicial channels, with no administrative or alternative GRM • Staffing in the Ministry department is unstable due to frequent transfers and appointments, and new staff may lack experience in resettlement World Bank principle

11 See MADAGASCAR - EVALUATION DU CADRE NATIONAL EN GESTION DE RISQUES E&S Cas de la NES5.

	• Limited resources for monitoring and evaluation RAP implementation and post-resettlement conditions.
OPPORTUNITIES • Strengthening of country and Implementing agencies systems to manage and implement the land acquisition process and associated risks to acceptable standards and harmonize national expropriation practices with Bank requirements on compensation timing, eligibility cut-off dates, and livelihood restoration, • MEH to work with relevant entities to develop guidelines on Land acquisition, economic and physical displacements (including livelihood restoration strategies), to support affected persons and avoid adverse impacts on their socio-economic status, assets and/or activities. • Strengthening MEH and DOE and other Implementing Agencies capacities through training on Land acquisition implementation measures, including development of RAPs/ARAPs, grievance handling, and stakeholder engagement that align with national regulations and PforR core principles. • Establishment of appropriate and transparent consultation mechanisms and documentation in the regions that operate under a communal land system • Enhance collaboration of resettlement activities with other relevant agencies such as Ministry of Finance, MATSF, and MEH...	**THREATS/RISKS** • Poor systematic implementation of land acquisition procedures as required by the WB PforR principles due to weaknesses of the local policies • Potential involuntary resettlement without compensation to informal settlers occupying public land illegally • Delay of land acquisition of affected persons • Lack of financial resources within the MEH for land acquisition and livelihood restoration for the PAPs. • The DOE lacks the authority to detect or halt developments and land acquisitions conducted without formal expropriation, even if involuntary resettlement occurs, which may lead to reputational and social risks. • The GOM has a different approach to the cut-off date than the WB. The GOM may grant green light to construction works after decree classifying the works in public interest, and without effective compensation. • Widespread non-titled land and coexistence of customary and formal regimes increase the risk of disputes and delays in expropriation processes • Exclusive reliance on courts for grievance resolution may cause delays affecting project timelines • **LEVEL OF RISK – SIGNIFICANT**

Core Principle 5: Indigenous People and Vulnerable Groups
Bank Policy for Program-for-Results Financing: Program E&S systems give due consideration to the cultural appropriateness and/or equitable access to, Program benefits, giving special attention to the rights and interests of Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities, and to the needs or concerns of vulnerable groups.
Bank Directive for Program-for-Results Financing: As relevant, the Program to be supported will: • Undertakes free, prior, and informed consultations if Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities are potentially affected (positively or negatively) to determine whether there is broad community support for the program. • Ensures that Indigenous Peoples can participate in devising opportunities to benefit from the exploitation of customary resources or indigenous knowledge, the latter (indigenous knowledge) to include the consent of the Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities. • Gives attention to groups vulnerable to hardship or disadvantage, including as relevant the poor, the disabled, women and children, the elderly, or marginalized ethnic groups. If necessary, special measures are taken to promote equitable access to program benefits.
Applicability: NOT Applicable

The World Bank does not acknowledge the presence of indigenous peoples or historically underserved communities in Madagascar. This determination is based on a set of characteristics, including self-identification as a distinct social group, collective attachment to ancestral lands or natural resources, unique social and cultural institutions, and distinct languages or belief systems. It should be noted that identification is context-specific and is not determined solely by vulnerability.

However, there is potential to discrimination with respect to the poor, the disabled, women and children, the elderly, and other identified vulnerable persons or groups regarding participation on the proposed program due to elite capture, poor consultations among others. It will therefore be important to take special measures to promote equitable access to the PforR Program benefits
However the Program interventions are likely to be implemented in areas with poor and Vulnerable groups presence, thus presenting risks such as: i) inadequate engagement and consultation with the poor and Vulnerable groups; ii) limited information disclosure ; iii) exclusion of the poor and Vulnerable groups from accessing project benefits; There is also a risk of: i) exclusion of vulnerable households who are unable to wire their premises from accessing electricity; ii) risk of elite capture limiting targeting of last-mile connectivity. Other risks include the expansion of electricity to last-mile consumers which may increase unsafe electricity utilization through, e.g., illegal connections. and disconnection of idle meters from persons unable to pay for the connection and/or service the token, which will mainly exclude the vulnerable households, due to the prevailing socio-economic challenges

STRENGTHS	**WEAKNESSES**
• The policies, strategies and constitution clearly emphasis the rights of vulnerable individuals and groups to have access to services. • The implementing agencies have previously worked in areas with the poor and Vulnerable groups, and this experience will assist in ensuring access to program benefits is well managed.	• There is no clear mechanism, guidelines, and procedures for targeting and inclusion of the poor and Vulnerable groups. The lack of targeted interventions, especially on meaningful public participation, prevents the poor and vulnerable groups from engaging in the development process and accessing culturally appropriate project benefits and opportunities. • Weak capacities to ensure compliance with required national standards on equitable access within the implementing agency • Weak multisectoral engagements results in lack of synergy among social protection departments (Resettlement department, DCD, department of labour, department of gender) and meaningful collaboration during the development of plans and design of public infrastructure. • Weak capacity to disseminate information to promote social accountability, equity and grievance redress mechanism at the local levels • There is no monitoring and evaluation system to measure progress of equitable access. • Weak capacity to disseminate information to promote social accountability and grievance redress mechanisms at community levels • Lack of awareness among the vulnerable groups, leadership, and professionals on the needs of Vulnerable groups • Lack of gender mainstream strategies to facilitate inclusion of gender equity in Programs • Inadequate consultation and engagement with vulnerable groups during the design of investments resulting in failure to incorporate provisions for universal access to all persons. This includes provision of ramps, disability-friendly sanitation facilities, childcare areas in markets • Inadequate resourcing of the process of engagement of the poor and Vulnerable groups which in some cases is viewed to be expensive given their remote location

OPPORTUNITIES	THREAT/RISKS
• Capacity building on management and training to encourage participation by the public. • Development of robust stakeholder management strategies within the systems as part of the public consultations Programs to strengthen and systematize projects consultation processes and grievance redress mechanisms. • Support for citizen engagement by promoting community driven infrastructure planning and development; requiring that investments are based on citizens needs assessments; taking into considerations Vulnerable groups special needs, and mandating active citizen participation in the design and implementation of infrastructure investments under the program • Collaboration with Department of Community Development to strengthen citizen engagement and identification of subprojects that will improve economic empowerment for the poor and VULNERABLE GROUPS • Opportunity of the program implementers to empower and benefit Vulnerable groups in an inclusive manner. • Strengthen requirements and address impacts on sexual exploitation and abuse-sexual harassment (SEA-SH); special measures should be taken to promote confidential reporting of SEA/SH related complaints and equitable access to Program benefits.	• Poor meaningful consultations with the vulnerable groups on the program to access program benefits • Introduction of barriers that hinder progress towards achieving the objective of social inclusion and increased equity brought about by elite capture, political interests, corruption, cultural, ethnic and gender disparities • Inability to target the inclusion of the vulnerable groups in consultation and delivery of program benefits and services to these groups will adversely affect the population especially the elderly, women, persons with disabilities. • The program seeks to be inclusive, but lack of clear and systematic strategies to ensure inclusion of vulnerable groups, persons with disabilities (PWDs) etc. might not close the existing gaps in the systems. • High poverty levels hinder vulnerable persons from accessing improved electricity supply **LEVEL OF RISK – LOW**

Core Principle # 6: Social Conflict	
Bank Policy for Program-for-Results Financing: Avoid exacerbating social conflict, especially in fragile states, post-conflict areas, or areas subject to territorial disputes	
Bank Directive for Program-for-Results Financing: As relevant, the program to be supported: Consider conflict risks, including distributional equity and cultural sensitivities.	
Applicability: Applicable i. Social conflicts may arise due to influx of workers into project areas that results in Gender-Based Violence (GBV) in particular, Sexual Exploitation and Abuse and Sexual Harassment (SEA-SH), an increase in crime, insecurity and upset community dynamics, competition for scares resources, and culturally inappropriate activities among others. ii. Projects may be located where community conflicts have been reported in the past, due to sharing of resources. iii. Social conflicts may also be exacerbated as a result of implementing intervention in areas with community boundary conflicts. The Program will not undertake projects that cause or exacerbate social conflict in fragile states, post-conflict areas, areas subject to territorial disputes, impact distributional equity or associated cultural sensitivities.	
STRENGTHS	**WEAKNESSES**
• Existence of procedures guiding public participation and consultation from the onset of project development will minimize social conflict. • The Government of Madagascar also has adopted policies that advance gender equality and youth inclusion in a supportive enabling environment.	• There is poor consultations and coordination of multisectoral agencies to reduce social conflict brought about by competition of resources between communities • Weak mechanisms to identify risks and preventative measures of social conflicts early in project design and subprojects implementation due to factors such as weak GRM uptake channels, inadequate documentation, follow up and resolution of grievances and complaints

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• The country systems clearly articulate the minimum requirements for equitable access and benefits for the persons with disability, women, and youth in its Programs to promote social inclusion and recognizes the vulnerable groups. • The government systems have embedded in the constitution the citizen engagement through Consultation and Public Participation (CPP) requirements •	• Weak capacities to ensure compliance at the implementing agencies and the law enforcement • Weak systems to disseminate information and mechanisms to reduce social conflicts at community levels • Political interference, elite capture, and weak procurement processes resulting in conflict between the local leaders and community on the available opportunities and proposed investments. • GRMs infrastructure is weak within the implementing agencies and other government MDAs with varied levels of functionality that have been applied to varying degrees of effectiveness in management of complaints and grievances that can be enhanced for the program. • Inadequate stakeholder engagement and information disclosure leading to potential social conflict
OPPORTUNITIES • Development of robust stakeholder management strategies within the systems as part of the current Public Participation programs to strengthen projects consultation processes • Strengthen implementing agencies grievance redress mechanisms. The GRM should be sensitive to all reported concerns including issues related to labour influx and have a referral pathway in case of GBV cases. • Integrate contractual obligations in the legal agreements and contracts for contractors to take responsibilities of the social risks, with appropriate mechanisms for addressing compliance • To address other cross cutting social issues arising during project implementation such as GBV/SEA-SH, there is a need to create awareness and mainstream HIV/AIDs, and GBV-SEAH in Program activities. • Incorporate training in social risks related to conflict to implementing agencies ESHS specialists as part of the wider capacity building for the program	**RISKS** • Lack of identification of conflict relatedconflict-related risks brought during program design due to limited stakeholder engagement and disclosure of Program information. • Potential conflict due to labor influx and other labor related risks (e.g. GBV/SH/SEA) between local communities and workers seeking employment opportunities • Hiring of contractors with weak E&S capacity to manage social related risks • Political interference may exacerbate social conflicts **LEVEL OF RISK – LOW**

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8 Measures To Strengthen System and Institutional Performance

141. This chapter summarizes measures recommended to strengthen the existing ESHS systems and institutional performance in line with the gaps and risks identified in the ESSA. The proposed measures shall be executed during Program implementation to address identified gaps and risks considering the existing country system and capacity versus the PforR core principles and key planning elements.

8.1 ESSA Findings

142. The ESSA established that:

- Madagascar has well-developed and robust regulatory framework consistent with the PforR six Core Principles, which, if effectively applied, will enhance the ESHS opportunities under the ASCENT Madagascar P4R.
- Social risk/impact management functions are fragmented across various institutions (e.g .gender management, departments responsible for community development, resettlement) with limited coordination mechanisms.
- There are inadequate targeting and inclusion of vulnerable groups and other disadvantaged and vulnerable groups in participation and accessing Program information, benefits and opportunities.
- The existing GRM systems are fragmented, poorly functioning, and ineffective in timely resolution of complaints. These systems do not adequately address specific issues (e.g. GBV /SEA/SH, workers complaints, etc) since they are customized to receive, record and handle issues that concern mainstream complains of the communities.
- There are local governance structures, that ensure that the communities and the government interact to facilitate access to service delivery and discharge of rights and responsibilities, with the aim to enhance the socio-economic status of these communities and other disadvantaged groups led by the MCDSS.
- Land acquisition and resettlement legislation is not clearly defined; and MDAs are responsible for their own land acquisition and resettlement. The xxx is not fully mandated to conduct expropriation on behalf of MDAs. There is need to develop legislation and guidelines to give clear mandates, roles and responsibilities to one organization that will oversee and supervise resettlement on behalf of the government infrastructure projects.
- The commitment of the contractors to enforcing ESHS provisions in the contracts is a key challenge due to weak country systems and gaps in areas such as livelihood restoration, GBV/SEA-SH, vulnerable groups, labor conditions, and structured GRM systems
- Limited monitoring and reporting on ESHS risks and impacts management potentially affecting the identification and implementation of mitigation measures.
- There is inadequate collaboration and coordination of activities among the Program teams with lead agencies despite previous work with international donors /multilateral development banks and lenders (including the related WB DECIM and LEAD projects).
- Inadequate staffing and technical skills combined to limited financial resources at MEH and the other agencies responsible for managing various aspects of this PforR to effectively manage and supervise ESHS risks and impacts for the projects across the country and centralization of functions limits responsiveness in rural and peri-urban areas
- No unified, national-level GRM exists across institutions; grievance handling is fragmented, often informal, and poorly documented.
- Stakeholder engagement and IEC activities are project-specific and promoter-led, with limited institutional strategies for sustained community engagement or behaviour change (e.g., pollution reduction, clean energy adoption)
- Lack of inclusion and/or implementation of ESHS clauses the contract and bidding documents and causing inadequate contract management and supervision of ESMP.

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8.2 ESSA Recommendations

143. Following the results of the SWOT analysis summarized in Table 7-1 (above), to mitigate identified ESHS risks and impacts, the Program interventions will undergo a screening process including the implementation of an exclusion criterion for certain activities which would result into high risks and significant negative ESHS risks and impacts which are irreversible or unprecedented on the environment and/or affected people. In addition, the ESSA has recommended the following to the Program Action Plan.

i. **Enhance capacity to manage ESHS risks and impacts:** The program will support extensive capacity building onESHS at MEH, through its Environmental Unit (CE MEH), including supporting the unit to enhance its monitoring and supervision of MEH projects and apropriate equipement dotations. CE MEH to coordinate the management of ESHS risks and impacts as a minimum condition in line to P4R core principles. The program will supplement the inhouse capacity with training to equip the team to have requisite skills to support the various ESHS aspects, including preparing ESIA/ESMPs/RAPs/PREES, monitoring and supervision of MEH project audits.

ii. **Engage early into the program planning process key stakeholders involved in ESHS management.** Relevant implementing agencies with mandates for ESHS risks and impacts management such as ONE, DSST, etc., will be integrated early into the program planning process, including participating in the screening of E&S risks and potential impacts of Program interventions, and to ensure that they participate fully in the program, and make an input into the decisions being made throughout the Program cycle.

iii. **Allocate adequate resources for ESHS aspects in the proposed investment budgets.** Evidence from previous IPF projects illustrates that safeguards management is often not adequately supported, especially the ESHS staff assigned to the programs. The Program should ensure that ESHS risks and impacts management strategies, including provision of adequate resources for ESHS staff, and enough budget allocation in the Bill of quantities for safeguards implementation during the investment identification, screening, planning and design processes. The resources shall also include budgetary allocation for preparing ESMPs/ESIAs, RAPs and PREES by independent consultants, capacity building of ESHS staff, and monitoring and evaluating the ESHS performance during implementation.

iv. **Support MEH to enhance and/or operationalize the GRM systems.** The program will support strengthening stakeholder feedback and grievance redress mechanisms, and Stakeholder feedback and GRM structures developed under previous donor or lender programs. This will include evaluating the effectiveness of the GRM and enhancing it to ensure that it is cultural appropriate and strengthening mechanisms to incorporate GBV cases.

v. **Strengthen implementation and monitoring of ESHS risks and impacts for successful ESHS outcomes.** To ensure proper management of ESHS risks, the Program will develop procedures for assessing performance on ESHS management, with performance protocols outlined in the ESHS Manual and the POM. These will reinforce systematic monitoring and enforcement of ESHS commitments by operators, including periodic audits and reporting requirements. The Annual Performance Assessment (APA) Terms of Reference (ToRs) shall also include ESHS performance assessment procedures to ensure a robust verification process.
Particularly for JIRAMA, support in mainstreaming QHSE functions into core operational processes and performance monitoring.

vi. **Strengthening the ESHS risks and impacts management systems to enhance the understanding of the country systems on ESHS and their application**. The Program will partner with relevant lead agencies in the ESHS risks and impacts management including MEH, ONE, DSST, etc to capacity build the capacity of MEH and contractors teams. The training will include but not limited to: (i) screening, management and reporting of ESHS risks and impacts; (ii) occupational health and safety; (iii) labour and working conditions; (iv) stakeholder engagement and social inclusion, (v) grievance management; and, (vi) statutory requirements

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for land acquisition and compensation, (vii) incorporation of ESMP and OSH contractor/supplier clauses in the bidding and contract documents for civil works, including signing of code of conduct (viii) training of contractors and their workers on ESHS. Other topics such as economic and physical displacement, and land acquisition will also be included. MEH in cooperation with ESHS agencies to develop a training program that will include regular training sessions to be provided during program implementation to respond to specific Program needs.

vii. **Include in contracts and bidding documents provisions for E&S management with attendant budgets.** Adequate budget shall be allocated to faciliate ESHS Officers to monitor project sites and give recommendations to the contractors on ESHS risks management. Procurement Officers for all the implementing agencies will be sensitized on ESHS requirements.

viii. **Develop land acquisition and resettlement guidelines dedicated to Energy sector**, to guide on land and wayleaves acquisition for the Program, with the close support of Department of Expropriation.

ix. **Include protocols on gender, vulnerable groups, PWDs and other disadvantaged/vulnerable groups, in the public participation guidelines.** Mainstream inclusivity of public participation for all projects at MEH to ensure meaningful consultation of all segments of the public.

144. To mitigate against ESHS risks and impacts, all sub-projects under the Program will undergo screening, which will include a set criterion for excluding certain categories of sub-projects which would result into high and substantial risks and significant negative E&S impacts which are irreversible or unprecedented on the environment and/or affected people, regardless of the government's capacity to mitigate the risks. All sub-projects will be required to follow the guidelines of the Environmental, Social, Health and Safety risks and management (ESHSRIM) Manual to be developed by MEH under the P4R program. In addition, the ESSA has recommended ESHS mitigation and enhancement measures in the Program Action Plan presented in the table below. The PAP shall be legally binding and incorporated into the Financing Agreement of the Program.

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Table 8-1: Proposed Environmental, Social, Health and Safety (ESHS) Program Action Plan

No	Action Description	Source	Responsibility	Timing		Completion Measurement
1.	Set up of an appropriate complaint handling mechanism for the Program	Environmental and Social Systems	ADER, MEF, MEH, JIRAMA	Due date	31 December 2026	• Complaint handling mechanism established within 3 months following the Program effectiveness
2.	Operationalization of ESHSRIM, by development of all ESHS procedures documented for all sub-projects.	Environmental and Social Systems	MoE / PMU and Implemening agencies ESHS specialists	Other	Within 6 months of program effectiveness	• Report summarizing evaluation of the need for training, and assignment or recruitment of additional E&S experts • Staff trained on ESHSRIM manual • Evidence of application of ESHS management systems in all projects • As required, necessary E&S ecperts asigned or recruited (to be determined by MEH/PMU)
3.	Capacity building to develop and streamline the ESHS processes and procedures with lead ESHS agencies in line with National Energy Policy (NPE 2015–2030)	Environmental and Social Systems	MEH/JIRAMA/ADER/Lead ESHS agencies	Recurrent	Continuous	• Environmental and Social permitting procedures streamlined to include Health and Safety and Social specialist review by lead agencies • Training and coordination Plan for EIA permitting of lead ESHS agencies • Number of trainings and technical assistance provided to relevant ESHS agencies on ESIA processes and procedures • Training reports • Evidence of application of ESHS management systems in all projects

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4.	Preparation and implementation of POM with relevant E&S Guidelines, including functional GRM structures at all subproject levels, guidelines on hazardous and non-hazardous waste management	Environmental and Social Systems	MEH, PMU and Implemening agencies	Other	Before commencement of sub-projects	• GRM constituted and grievances being logged, responded, and resolved for sub-project levels • Confirmed annually through APA
5.	Include a robust ESHS risks and impacts management verification protocol and include in Annual Performance Assessment (APA)	Environmental and Social Systems	MEH, PMU and Implemening agencies	Other	Before APA Annually	• Inclusion of APA verification indicators in the ToRs for APA • Inclusion of a chapter on ESHS in the main APA reports
6.	Conduct an independent annual ESHS audit for all infrastructure investments, and reports shared with the WB	Environmental and Social Systems	PMU, Independent auditor	Other	Annually	• Independent Annual ESHS Audit report
7.	Include adequate supervision and monitoring budgets and all the applicable ESHS clauses and in the bidding and contract documents for civil works	Environmental and Social Systems	MoE/PMU	Other	Prior to procurement of any civil works	• Bidding and Contract document includes ESHS aspects. • Allocation of adequate ESHS budget in bills of quantities for all subprojects • Supervision and monitoring reports and confirmed through APA
	Develop PforR project guidelines on hazardous and non-hazardous waste management, taking into	Environmental and Social Systems	MoE/ONE	Other	Prior to procurement of any civil works	• Project WMP

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	account the weak infrastructure in Madagascar at all levels for SWM. Note: This will rely on a study (existing or to be undertaken) on WM in Madagascar. The sub-project PREES will indicate site options for WM. WM guidelines will include management of electronic and hazardous waste, including damaged meters, cables, transformers, solar panels, batteries, and associated packaging materials.					
	Develop PforR project guidelines on resettlement, including sub-project criteria for when resettlement will be allowed. This could take the form of a Resettlement Policy Framework (RPF). Guidelies will include development and implementation on development and implementation of Resettlement Action Plans	Environmental and Social Systems	MEH/etc.	Other	Prior to procurement of any civil works	• Project Resettlement Guidelines

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	(RAPs). Definition of the roles for the various PforR players to be involved will be included. The gjuidelines will be in compliance with World Bank Group ESS5.					
	Promote and provide means for effective and inclusive engagement of stakeholders including monitoring the consultation process and providing feedback on the implementation of citizens' priorities. .	Environmental and Social Systems	MEH	Continuous	Start during screening and continue through life of sub-project	• Summaries of meetings and participation lists
	Disclose appropriate Program information on E&S risks and impacts in a timely manner to ensure meaningful consultations, in relevant local languages, in a manner that is accessible and culturally appropriate, considering any specific needs of groups that may be differentially affected by the Program, or groups of the population with	Environmental and Social Systems	MEH/ONE	Continuous	Start during screening and continue through life of sub-project	• Provide access to documents on MEH and World Bank websites • Develop non-technical summary for presentation at disclosure meetings with stakeholders

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	specific information needs, such as disability, literacy, gender, mobility, differences in language or accessibility.					
	Ensure adequate documentation of all stakeholder engagement process including discussions held, key concerns raised, responses given and agreed actions. Collect photographic evidence to the extent possible. ▪	Environmental and Social Systems	MEH	Continuous	Start during screening and continue through life of sub-project	• Meeting summaries
	Support development of climate change screening tools to be integrated into the sub-projects design, monitoring and tracking of climate change related risks and proposed mitigation and/or adaptation measures.	Environmental and Social Systems	MEH/ONE	Continuous	Screening	• Online version of tools and guidelines for their use
	Conduct feasibility and design studies that will identify proper siting, planning and execution of the sub-projects to minimize impacts on	Environmental and Social Systems	MEH	Continuous	Screening and sub-project design	• Study reports

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	natural habitats and PCR resources. ▪					
	Develop an E&S screening checklist for screening sub-projects to identify any potential impacts to natural habitats and physical cultural resources before undertaking environmental assessments.	Environmental and Social Systems	MEH/ONE	Continuous	Screening	• Checklists
	The Program will partner with OSH to enhance the capacity of implementing agencies on health and safety risks management based on national laws and regulations through training of ESHS staff on OHS Develop a simplified OHS manual for contractors.	Environmental and Social Systems	MEH/	Other	Prior to selection of sub-projects	• Summary of any training undertaken • Guidance documents
	▪ Explore strategies to use alternative materials instead of wooden poles, such as plastic poles	Environmental and Social Systems	MEH/Contractor	Continuous	During design phase of transmission and distribution line sub-projects	• Sub-project feasibility report

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9 Annexes

9.1 Annex 1: Relevant Policy, Legal, and Regulatory Framework for Environment, Social, Health and Safety Management

Table 9-1: Country System (Policies, Regulatory and Legislative Frameworks) as Written and Relevance to the ASCENT Program

Legislation	Provisions as Written	Alignment with PforR Core Principles	Gaps against PforR Core Principles
Environmental, Health and Safety Management Systems			
The Constitution of the Fourth Republic of Madagascar, adopted 2010	The Constitution of the Republic of Madagascar is the supreme law of the environment, the land, and any law or practice that contradicts its provisions is null and void. It establishes the fundamental principles governing the Malagasy State, including the protection of natural resources, environmental stewardship, and sustainable development. The Constitution requires to promote sustainable development, protect the environment, ensure the rational and equitable management of natural resources, and safeguard nationally significant ecological assets—including forests, flora and fauna, mineral resources, coastal zones, and other environmentally sensitive areas. It further establishes that sustainable and transparent governance, conservation of natural resources, and environmental protection form essential conditions for national development. The Constitution also upholds the rights and freedoms of citizens, including those related to a healthy environment, while imposing obligations on the State to prevent environmental degradation, ensure balanced territorial development, and uphold the rule of law in environmental and natural resource management.	The Preamble reiterates Madagascar's commitment to human rights and international environmental conventions and recognizes the exceptional ecological value of the island's biodiversity, which must be preserved for future generations. It also establishes that environmental protection, sustainable development, transparent natural resource management, and prevention of environmental degradation are fundamental principles of governance. In this regard, the Constitution is consistent with the six Core Program-for-Results (PforR) Principles. It embeds foundational requirements that mirror ESHS obligations, including the duty of the State to ensure balanced development, protect natural resources, preserve ecological assets, uphold human rights, promote public participation, and guarantee justice and equality before the law. The Constitution requires the rational and equitable management of natural resources, recognizes the importance of preventing pollution and environmental harm, and	None

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		obliges the State to implement governance systems that ensure transparency and accountability. Program activities under the P4R shall therefore be carried out in a manner that ensures compliance with constitutional obligations related to environmental and social management. This includes the conduct of environmental and social impact assessments; implementation of mitigation, monitoring, and auditing measures; ensuring citizen engagement and public participation; transparency and access to information; protection of labor rights and occupational safety; inclusion and non-discrimination toward vulnerable and marginalized groups; compensation of persons affected by land acquisition; and adoption of institutional mechanisms for continuous environmental and social oversight.	
Law No. 2015-003: Revised Charter for the Malagasy Environment	The overall vision of Madagascar's Updated Environmental Charter (Law No. 2015-003) is to provide a comprehensive framework for the sustainable management, protection, and enhancement of the country's environment and natural resources, ensuring that they retain their ecological integrity and remain capable of supporting the needs of present and future generations. The Charter affirms that Madagascar's unique biodiversity and natural wealth constitute a national and global heritage that must be preserved, and that sustainable development, the precautionary principle, prevention of environmental degradation, public participation, and access to environmental information are fundamental guiding principles of national policy. The guiding principles on environmental health and human settlements include the following: • Urban, peri-urban, and rural development planning must integrate environmental protection, human health considerations, and disaster-risk preparedness, in line with the precaution and prevention principles reflected in the Charter. • Human settlements should incorporate environmental sustainability, pollution control measures, and climate-related	The Law No. 2015-003 is well aligned with the with Core Principles 1, 2, 3, and 6 through environmental assessment, biodiversity protection, pollution control, and participation The policy is particularly relevant to the proposed Program in that it explicitly promotes environmental and social sustainability, transparency, and inclusive public participation. The Charter embeds the precautionary, prevention, polluter-pays, and public participation principles, and guarantees the right of every person to access environmental information that influences decision-making. In line with these legal obligations, all Program activities will undergo environmental, social, and safety screening; and any activities likely to generate environmental or social impacts	none

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	risk management, recognizing that environmental quality directly determines population health and well-being. • Temporary settlements—such as those hosting displaced persons or communities affected by emergencies—must comply with the same environmental and public health standards applied to all other human settlements, including requirements for environmental assessment, mitigation, and monitoring. The development and improvement of human settlements should adopt community-based development principles, ensuring access to essential social services—including water supply, energy, education, health centers, transportation, communication, and security—to promote sustainable local development and avoid unplanned or environmentally harmful settlement expansion.	will be subjected to detailed environmental and social assessments before the commencement of works. Throughout the Program cycle, periodic environmental, social, and safety audits will also be conducted to ensure compliance, monitor implementation of mitigation measures, and uphold continual improvement in environmental and social performance.	
Decree No. 2025-080 (28 January 2025) updates rules and procedures for environmental and social assessment in Madagascar under the MECIE framework.	This new decree represents a major reform of the national environmental and social governance system, replacing a regulatory framework that had remained unchanged for nearly two decades. It introduces a modernized, integrated approach to environmental and social evaluation, requiring all investment projects to undergo systematic Environmental and Social Impact Assessment (ESIA), supported by clear categorization procedures, strengthened screening criteria, and mandatory Environmental and Social Management Plans (ESMP/PGES). The decree reinforces the obligation to anticipate, prevent, mitigate, and monitor environmental and social risks before project implementation, while ensuring that communities and local stakeholders participate meaningfully in the decision-making process. -making process.	The update per this decree aims to align with international sustainability standards, as it enhances regulatory clarity, accountability, and transparency, providing government agencies with stronger tools for oversight and compliance, including monitoring mechanisms, audits, and sanctions in cases of non-compliance. It positions environmental and social protection as a driver of responsible investment, sustainable development, and public trust. Partial alignment with Core Principles 1 and 6; as ESIA requirements strengthened but institutional effectiveness	The decree is broadly aligned with CP environmental sustainability objectives—particularly the requirement to conduct Environmental and Social Impact Assessments (ESIAs), prepare Environmental and Social Management Plans, and undertake monitoring and follow-up actions. -up actions. However, the revised text introduces institutional and procedural changes that may reduce the effectiveness of environmental and social risk management. First, the restriction of ONE's mandate to manage environmental complaints **only for projects holding environmental permits** may limit accessibility to grievance mechanisms for affected communities, which is inconsistent with **CP6** principles on inclusive stakeholder engagement and accessible, project level Grievance Mechanisms. -level Grievance Mechanisms. Second, the financing model—whereby environmental assessment fees collected by ONE are redirected to fund the

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			Ministry's control functions—may weaken ONE's operational capacity and compromise its ability to fulfil independent oversight obligations required under **CP1**. Third, the decree does not adequately address the issue of accountability regarding non-compliance: Article 177 does not clearly assign responsibility for violations such as absence of an environmental permit or unapproved PrEES, placing responsibility primarily on the supervising ministry instead of the project proponent or contractor. This weakens alignment with **CP1**, which requires clear institutional responsibility, enforceable compliance, and sanctions for non-performance. Furthermore, compared with the earlier MECIE version, several regressions reduce alignment with CP1. These include: the removal of MEF's responsibility to allocate funds for EIAs and SEAs of public investments (affecting independence and quality of assessments); withdrawal of the permanent delegation allowing the ONE Director General to issue environmental permits (risking administrative delays and fragmentation of authority); removal of critical social impact considerations—such as community displacement, livelihood losses from agricultural, pastoral, or fishing disruptions—from the list of issues to be assessed (directly conflicting with **CP4** on land acquisition and involuntary resettlement); reformulation of provisions related to land acquisition and resettlement (reducing clarity and protections previously embedded in national regulations); and removal of certain paragraphs from Annex I that

			previously ensured a comprehensive scope of environmental and social review.-General to issue environmental permits (risking administrative delays and fragmentation of authority); removal of critical social impact considerations—such as community displacement, livelihood losses from agricultural, pastoral, or fishing disruptions—from the list of issues to be assessed (directly conflicting with Given these gaps, Program activities must ensure that environmental, social, and safety screening processes remain rigorous and fully aligned with CPs requirements, regardless of the limitations of the decree. All Program supported activities will therefore undergo detailed environmental and social assessments, integrate social impact considerations (including resettlement, livelihood impacts, and vulnerability analysis), and implement robust ESMPs consistent with **CP1-6.**
Order No. 6830/2001: Public Participation in Environmental Assessment	establishes the mandatory procedures for public participation in environmental assessment in Madagascar. The Arrêté requires that the affected public be informed of the existence of a proposed project and be given the opportunity to express their views. Public participation may take the form of onsite consultation of project documents, a public inquiry, or a public hearing, and must include both an information phase—during which the project is presented to the public—and a consultation phase dedicated to gathering the opinions of stakeholders impacted by the project. The specific modality of participation to be applied for each project is defined in environmental technical guidelines issued by the National Office for the Environment (ONE), and these must be communicated to the project proponent at least fifteen (15) days before the public participation stage begins. Projects, including the DECIM Project, are legally required to comply with the provisions of this Arrêté:site-specific consultation of project documents, a public inquiry, or a public hearing, and must include both an information phase—during which the project is presented to the public—and a consultation phase dedicated to gathering the opinions of stakeholders concerned by the project. The specific modality of participation to be applied for each project is defined in environmental technical guidelines	It is well aligned with CP **6 on participation and social conflict prevention**, as it establishes mandatory mechanisms for informing and consulting the public during environmental assessment processes. The Arrêté requires project proponents to ensure that affected communities are informed of the proposed project and that their views are systematically collected. It defines clear modalities for public participation—consultation on site, public inquiry, or public hearing—and specifies that each process must include an **information phase** and a **consultation phase**, during which feedback from affected people is formally gathered	none

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	issued by the National Office for the Environment (ONE), and these must be communicated to the project proponent at least fifteen (15) days before the public participation stage begins. Projects, including the DECIM Project, are legally required to comply with the provisions of this		
Interministerial Order No. 4355/97: Establishment and Delimitation of Sensitive Areas	This order is part of the implementation of the MECIE decree on the compatibility of investments with the environment. Article 2 defines sensitive areas as areas consisting of one or more biological, ecological, climatic, physico-chemical, cultural or socio-economic elements characterized by a specific value and a certain fragility with regard to human activities and natural phenomena likely to modify these elements and/or degrade or even destroy the area in question. The following are considered sensitive areas: coral reefs, mangroves, islets, tropical forests, areas prone to erosion, arid or semi-arid areas prone to desertification, marshlands, nature conservation areas, drinking water, mineral water or groundwater protection areas, paleontological, archaeological and historical sites and their protection areas. Areas that are home to protected and/or endangered species are merged with the natural conservation areas within which they are located.	This order defines and delineates environmentally sensitive areas within the MECIE framework, is well aligned with theCP1 and 3. By identifying sensitive zones—including coral reefs, mangroves, tropical forests, erosion-prone areas, arid or semi-arid zones, wetlands, natural conservation areas, groundwater protection perimeters, and sites of paleontological, archaeological, or historical value—the Order reinforces key principles relating to early risk identification, protection of biodiversity, and conservation of natural and cultural heritage. Its definition of sensitive areas as ecologically, biologically, physically, socio-economically, or culturally fragile aligns with **CP1-3**, which requires the screening of environmental and social risks and the application of strengthened mitigation measures in proportionate-risk contexts. .	none
The Code de la Santé, enacted as Law No. 2011-022 on 15 July 2011.	The law defines the fundamental principles governing public health within Madagascar's National Health Policy and assigns decentralized authorities the responsibility to implement and enforce sanitary regulations, including those related to settlement hygiene, environmental health risks, and community protection measures. The Code also requires strict obligations on any physical or legal person—public or private—whose activities may cause pollution or present risks to water resources or environmental hygiene. The law requires project operators to factor environmental impacts into their operations and to take preventive, mitigative, or corrective actions to eliminate actual or potential dangers to the	It is broadly aligned with the CP1 and 3, as it establishes a comprehensive system of public health, hygiene, pollution control, and environmental protection measures that reinforce the preventive and risk management principles central to **CP1 and 3 through environmental health and safety safeguards** . The construction, activities on the program may affect flora and fauna in the area. The	none

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	environment and public health. It also prohibits the discharge of waste or any substances harmful to environmental or water quality, and it mandates that workers have access to potable water. The Code's provisions on solid waste management require waste generators to dispose of hazardous and non-hazardous waste using safe, modern, and environmentally protective methods such as controlled storage, recycling, incineration, landfill, or composting. Its restrictions on medical privacy, specifically the prohibition against employers requiring screening for sexually transmitted infections (STIs/ISTs), contribute to consistency safeguard worker rights, nondiscrimination, and dignity.	project will ensure that all personnel on site undergo orientation on how to handle the siting of wild species.	
Decree No. 2011-626: HIV/AIDS Policy in the Workplace	It establishes measures for HIV/AIDS prevention and non-discrimination in the workplace. The decree requires employers to take all necessary actions to prevent HIV/AIDS transmission in the workplace and explicitly prohibits any form of discrimination based on a worker's serological status. It further bans HIV testing during recruitment medical examinations or routine medical assessments, protecting workers' rights to privacy, dignity, and non-discrimination. In addition, the decree mandates employer-supported awareness and sensitization activities on HIV/AIDS	It sets mandatory measures for HIV/AIDS prevention and non-discrimination in the workplace, is strongly aligned with the 3 and 5 protecting worker health and vulnerable groups, by promoting regular sensitization and awareness-raising within workplaces, thereby contributing to overall public health and strengthening risk-prevention measures. Given that ASCENT involves extensive engagement with contractors, laborers, field-based personnel, community workers, and technical partners across multiple regions of Madagascar, compliance with Décret n°2011-626 is essential. The Program will rely on a diverse workforce—including temporary and contracted labor—making the reinforcement of nondiscrimination, health protection, and HIV/AIDS awareness critical to maintaining safe and inclusive working environments. The decree directly supports the Program's Labor Management Procedures (LMP), Codes of Conduct, and worker-related risk-mitigation measures required under CP3. By prohibiting discriminatory medical testing and mandating workplace	none

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		sensitization on HIV/AIDS, the decree strengthens ASCENT's obligations to ensure dignified treatment of workers, reduce health-related stigma, and promote safe working conditions.	
Decree No. 2014-130: National HIV/AIDS Workplace Policy	The decree reaffirms and operationalizes the nondiscrimination provisions of Décret n°2011-626 by prohibiting any form of stigma or differential treatment toward workers living with HIV/AIDS, and by reiterating that HIV testing in the workplace is strictly forbidden. Test results cannot be transmitted to employers, in order to ensure confidentiality and to protect workers' dignity and privacy> The decree also requires workplaces to implement appropriate behavior and occupational health and safety standards aimed at minimizing HIV transmission risks. These measures include the posting of procedures to follow in the event of accidents involving potential blood exposure, the availability of clean water points with disinfectants, protective materials such as gloves and masks, regular workplace disinfection, and mandatory provision of appropriate protective equipment to workers handling sharp tools.	Décret n°2014-130 of 12 March 2014, which operationalizes the National Workplace Policy on HIV/AIDS, is strongly aligned with the CP**3 and 5 on worker safety and inclusion**. ASCENT will involve the mobilization of a diverse workforce—including contractors, technical staff, and field personnel—across multiple regions.	None
2024 Labour Code of Madagascar	Updates and replaces Madagascar's previous Labour Code, establishing the principal legal framework governing employment relations, working conditions, occupational safety and health, and worker protections in the country. The law modernizes the regulatory system by addressing application challenges found in the former 2003 Labour Code and adapting labour legislation to evolving socio-economic realities, including lessons learned from the COVID-19 pandemic. It emphasizes hygiene, safety, and technical-socioeconomic aspects of work as core components of labour regulation. The updated Code incorporates Madagascar's commitments under international labour conventions ratified by the country—such as ILO Conventions on migrant workers (C97 and C143), safety and health at work (C155 and C187, ratified in 2023), as well as instruments related to private employment agencies (C181), domestic workers (C189), and the Forced Labour Protocol of 2014. These conventions inform strengthened protections for workers, including clearer definitions of employers and workers and greater inclusion of foreign and migrant workers under the Code's coverage. The law introduces significant reforms to employment contracts, restricting misuse of fixed-term contracts (CDD), tightening the conditions under which they may be renewed, and encouraging greater use of permanent contracts	Loi n°2024-014 (Labor Code du Travail is broadly aligned with the **CP1 and 3**, as it modernizes and strengthens the national legal framework governing employment, health and safety at work, equality of treatment, and worker protections. According to the Exposé des motifs, the updated Labor Code aims to address longstanding implementation gaps in the previous 2003 Labor Code, adjust the law to evolving socioeconomic realities, and harmonize national legislation with international labor conventions ratified by Madagascar—including ILO Conventions on migrant workers, occupational safety and health (C155 and C187 ratified in June 2023), private employment agencies (C181), domestic workers (C189), and the Forced Labour Protocol of 2014. These	Worker categories under ESS2. ESS2 defines "project workers" and distinguishes four categories: direct workers, contracted workers, community workers, and primary supply workers. This typology applies to full-time, part-time, temporary, seasonal, and migrant workers. Malagasy labor law does not explicitly recognize "community workers" or "primary supply workers" as categories, which creates a coverage gap for those groups under national frameworks. There are no direct contradictions between national labor legislation and CP3. However, material gaps remain in the consistent application of worker safety, labor protection, and oversight mechanisms, particularly in relation to

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	(CDI). It also strengthens regulation of service-contracting arrangements to prevent enterprises from using subcontracting to avoid direct employment obligations. Provisions on working time are updated, maintaining the 40-hour weekly limit but allowing more flexible arrangements such as individualized schedules and regulated teleworking, with requirements for employers to set out telework conditions in internal regulations. The Code reinforces worker protection, equity of treatment, and occupational safety and health (OSH) by dedicating an entire Title to safety and health at work and increasing employers' obligations to ensure safe working environments. It also strengthens trade union rights, enhances the legal framework for social dialogue, modernizes dispute-resolution procedures, and imposes stricter sanctions for violations of labour rights.	align strongly with CP3 principles on non-discrimination, decent working conditions, protection of vulnerable workers, and elimination of forced labour. Given that ASCENT involves largescale technical assistance, field based activities, and interactions with contractors and service providers across multiple regions, the updated Labor Code provides an essential legal foundation for managing labor-related riskscale technical assistance,	contractors and third parties. These gaps need to be addressed through Programspecific instruments (e.g. contractual OHS requirements, worker grievance arrangements, and thirdparty oversight provisions) to ensure effective implementation of CP3. **10 Applicability to contractors and third parties** • CP3 requires Program systems to protect the safety and working conditions of all workers engaged in Program activities, including those employed by contractors, subcontractors, supervising firms, and other third parties, through enforceable measures and effective oversight. • In practice, CP3 compliance is achieved by embedding OHS requirements, Codes of Conduct (including SEA/SH provisions), prohibitions on child and forced labor, and worker grievance arrangements into procurement documents and contracts, and by monitoring their application. • National practice primarily places obligations on direct employers through internal regulations or collective agreements and does not systematically extend equivalent requirements to contractors or suppliers. • Gap: CP3 requirements related to worker safety and labor protections for thirdparty workers are not automatically

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			ensured under national law and must therefore be contractually enforced and monitored under the Program. **11 Worker grievance mechanisms (WGM)** • CP3 requires Program systems to provide accessible and effective mechanisms for workers to raise concerns related to working conditions, occupational health and safety, and workplace conduct, without retaliation. • While Malagasy law relies on staff representatives and the labor inspectorate, formal grievance channels are often limited in scope and not designed to address Program specific risks or contractor related issues. • Gap: To meet CP3 expectations, a Program level worker grievance mechanism must be established or extended to cover direct and contracted workers, particularly where contractorlevel mechanisms are absent or inadequate. **12 Workers engaged through informal or community based arrangements** • CP3 requires that all workers involved in Program activities be protected from unsafe working conditions, including exposure to hazards, unsafe equipment, or abusive practices, regardless of

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			the contractual form of engagement. • National legislation does not explicitly regulate community based or informal labor arrangements, creating risks related to OHS, child labor, forced labor, and SEA/SH. • Gap: Program instruments must define clear procedures, safety requirements, and grievance access for workers engaged through informal or communitybased arrangements to ensure CP3 compliance. **13 Supply chains and hazardous labor risks** • CP3 requires Program systems to prevent exposure of workers to serious safety risks, including risks related to child labor, forced labor, or hazardous working conditions in activities directly linked to Program implementation. • National law does not impose systematic due diligence or monitoring obligations for labor risks in supply chains. • Gap: Program specific measures are needed to identify and manage serious labor and safety risks associated with key suppliers relevant to Program activities, in line with CP3. **14 Contractor management and monitoring of labor performance**

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			• CP3 requires that labor and worker safety provisions be integrated into procurement, contracts, and supervision arrangements, including:
			  ○ Verification of contractor capacity to manage OHS risks;
			  ○ Monitoring of compliance with safety standards and Codes of Conduct;
			  ○ Corrective actions and remedies in case of noncompliance.
			• These requirements go beyond standard national practice, which focuses mainly on employer/employee relationships and ex-poste labor inspection.
			• Gap: Effective CP3 implementation requires systematic integration of worker safety and labor protection requirements into Program procurement, contract management, and monitoring systems.

Order No. 889 of May 20, 1960 on general occupational health and safety measures	Establishes the general hygiene and safety requirements applicable to construction sites and workplaces in Madagascar. It mandates that all building and civil-works sites must maintain constant cleanliness and ensure hygiene and sanitary conditions necessary to protect the health of workers. The Arrêté also defines obligations related to accident prevention: all vehicles, machinery, and construction equipment used on worksites must be kept in good working condition and must be equipped with fully functional braking, lighting, and signaling systems. These measures are intended to prevent workplace accidents	It is broadly aligned with the CP3. The Arrêté requires that worksites be kept in a constant state of cleanliness and maintain sanitary and hygienic conditions necessary to protect worker health. Under the proposed program, ASCENT involves multiple construction works, field missions, site activities, and the use of	None

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	and ensure safe working environments for personnel on construction and infrastructure sites.	vehicles and equipment across different regions of Madagascar.	
Law No. 99-021: Industrial Pollution Management and Control Policy	Loi n°99-021 establishes the national policy framework for the rational management and control of industrial pollution in Madagascar. It sets out obligations for industrial operators to ensure that their activities prevent or minimize environmental harm. The law specifies that the management of **residual materials**, such as solid waste and expired products, remains the full responsibility of the waste generator until final disposal. It emphasizes a preventive and proactive approach to environmental protection by requiring operators to adopt **cleaner production methods**, reduce waste generation, and implement appropriate measures for recycling, valorization, treatment, and safe disposal of industrial waste. Furthermore, the law mandates that all harmful effects of pollution must be addressed through appropriate preventive actions and corrective measures, ensuring that industrial activities safeguard environmental quality and public health. It establishes the national policy framework for the rational management and control of industrial pollution in Madagascar.	Loi n°99-021 aligns strongly with the **CP1 and 3**—as it promotes systematic pollution control, cleaner industrial processes, and full accountability for waste management. Its requirements for reducing, treating, and safely eliminating industrial waste directly reinforce expectations regarding pollution prevention, hazardous waste management, and life-cycle environmental responsibility. The law's emphasis on preventive action, waste minimization, and mitigation of harmful pollution effects is also fully consistent with mandate that project risks be identified early and managed throughout the project cycle. ASCENT scopes may involve technical assistance, infrastructure-related activities, or indirect support to sectors generating waste or emissions, and should comply with national standards for pollution prevention, waste management, and avoidance of harmful discharges to air, water, and soil. Pollution control and related environmental norms frequently apply to fuel processing, depots, and logistics	None
Decree No. 2015-930: E-Waste Classification and Environmental Management	Décret n°2015-930 of 9 June 2015 establishes the national system for the classification and environmentally sound management of Waste Electrical and Electronic Equipment (E-waste) in Madagascar. The decree applies to domestic, professional, leisure-related electronic and electrical equipment, and defines the principles and responsibilities governing their management throughout their life cycle. It adopts a structured approach to regulating E-waste by imposing the polluter-pays principle, requiring producers and holders of electrical and electronic equipment to ensure proper waste handling, and establishing financing mechanisms for the system.	It is aligned with CP1 and 3. The decree's requirements for environmentally sound management of electrical and electronic waste—covering classification, collection, recycling, treatment, and disposal—mirror expectations for pollution control, hazardous-waste management, and lifecycle environmental responsibility. The polluter-pays principle and the decree's mandatory documentation of	None

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	A key provision of the decree is Article 11, which creates the Bureau National de la Convention de Bâle (BNCB), tasked with implementing the Basel Convention at national level; establishing systems for the control, management, and disposal of hazardous waste—including E-waste; coordinating and supervising actors involved in e-waste management; developing the national waste management plan; assessing environmentally sound management practices; monitoring the national governance framework; and preparing fund-use plans for approval by the Minister of Environment. Chapter V of the decree defines the full sequence of environmentally sound E-waste management, including pre-collection, collection, storage, reuse, recycling, treatment, and final disposal. It also introduces mandatory documentation such as hazardous waste tracking manifests, notification documents, and movement documents, ensuring traceability and regulatory oversight throughout the waste-management chain.	hazardous-waste movements strengthen transparency, accountability, and risk monitoring. ASCENT activities may generate or indirectly contribute to the generation of electronic and electrical waste Pollution control and related environmental norms frequently apply to fuel processing, depots, and logistics	
Law number 98-029: the Water Code.	Establishes the legal framework governing the protection, use, and management of water resources in Madagascar. The Code specifies that any installation, structure, activity, or work undertaken by a physical or legal person—public or private—that involves withdrawals from surface or groundwater or may affect the level, quality, or flow of water must be placed under the regular surveillance of the competent administrative authority. This includes all activities likely to impact hydrological regimes, water quality, or water availability. The law sets out obligations relating to water protection, pollution prevention, sustainable abstraction, and the preservation of water resources as a public good. It forms the basis for regulatory oversight of water-related activities across the country.	well aligned with CP1 and 3—as it mandates administrative monitoring of any activity that could impact water levels, quality, or flow, reinforcing the emphasis on early identification and control of environmental risks. ASCENT activities may interact with water systems directly (e.g., through construction, site operations, or infrastructure support) or indirectly (e.g., through technical assistance provided to municipalities, environmental agencies, or service providers). Pollution control and related environmental norms frequently apply to fuel processing, depots, and logistics	none
Decree No. 2003-943: Water Discharge & Pollution Control	establishes the national regulatory framework governing any discharges, flows, deposits, or releases—direct or indirect—into surface or groundwater in Madagascar. The decree is based on the principle that any activity that may cause pollution must adopt all necessary measures to prevent, reduce, or eliminate both actual and potential environmental dangers. It defines the types of organisms, installations, and activities subject to its provisions, and specifies the receiving environments covered by the regulations, including rivers, lakes, groundwater, wetlands, and other water bodies. The decree further establishes that all discharges, effluents, or deposits are subject to prior authorization	Aligns strongly with the CP1 and 3. Its requirement for prior authorization of all water discharges—combined with mandatory preventive measures to avoid harmful pollution—directly incorporates principles of early risk identification, mitigation, and strict pollution control.	

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	issued by the Director of the relevant Agence de Bassin, and such authorization can only be granted after the completion of a public inquiry, ensuring transparency and public participation in decisions affecting water quality.	Pollution control and related environmental norms frequently apply to fuel processing, depots, and logistics	

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Legislation	Provisions as Written	Alignment with PforR Core Principles	Gaps against PforR Core Principles
Social Management Systems			
Law No. 2015-051 on Land Use Planning	establishes the national legal framework guiding territorial planning in Madagascar. The law affirms that **landscapes must be preserved**, and that specific land use designations—including **agricultural zones**, public facilities, and other spatial classifications—must be formally identified and protected through territorial planning tools. One of the central instruments defined by the law is the **Schéma d'Aménagement Communal (SAC)**, which sets the principles governing land occupation at the communal level, including the delineation of agricultural land and the allocation of public infrastructure. The law also provides that the detailed rules for applying the SAC are set by regulatory texts, ensuring a coherent implementation approach. More broadly, the law seeks to ensure balanced spatial development, harmonized land use, and the protection of rural and urban environments across the national territory-use designations—including	Its requirements for structured land-use planning, preservation of landscapes, and clear zoning—especially agricultural and communal land—support risk-identification and avoidance principles. The law's provisions that regulate the occupation of land and define land-use constraints indirectly reinforce by helping prevent unplanned conversion of land, minimizing the risk of displacement or livelihood disruption. ASCENT interventions occur across diverse territorial areas where land-use constraints, agricultural areas, and spatial planning may condition program effectivity risk management. .	NOne
Law No. 2019-008: Gender-Based Violence	An Act to establish Madagascar's comprehensive legal framework for preventing, prosecuting, and sanctioning **gender based violence (GBV)**, while also ensuring the **protection, support, and reparation of victims**. The law was adopted to fill a national legal gap and reinforce existing criminal provisions by introducing specific measures against GBV. It defines gender and GBV broadly, covering physical, sexual, psychological, and economic violence occurring in private or public spaces, and includes new offences such as **marital rape, harmful traditional practices, sexist insults, and economic violence**. It also establishes a **national mechanism to combat GBV**, strengthens repressive measures against perpetrators, and sets out detailed articles on **prevention, victim protection, and service provision**, including medical, psychological, legal, and social support. The law is structured into four Titles: general provisions (definitions and scope), repression (Articles 3–12), prevention and victim support (Articles 13–20), and final provisions (Articles 21–22).**-based violence (GBV)**	The law is well aligned with the CP1-6. Its strong protections against gender-based violence support requirements for safe, fair, and non-discriminatory working environments, and reinforce obligations to ensure community health, safety, and protection from sexual exploitation and abuse/sexual harassment (SEA/SH). The law's provisions on prevention, prosecution, victim protection, confidentiality, and establishment of support mechanisms directly complement expectations for GBV risk mitigation, grievance redress, and survivor-centred response systems. Furthermore, the law's formal recognition of various forms of GBV — including psychological, sexual, and economic violence — aligns with requirements to identify, assess, and manage SEA/SH risks across project activities. Given that ASCENT involves extensive engagement with communities, public institutions, contractors, and project workers, compliance with this law is critical to ensuring SEA/SH-free operational environments.	There is need to streamline the implementation of this policy at all levels of government and non-governmental actors as it aligns well with international best practices on GBV issues
ecree No. 2007-563 & Decree No. 2018-	These decrees establish the national rules governing child labour in Madagascar, defining the types of work that children may perform and specifying prohibited	The child labour framework established by Décret n°2007-563 on July3, 2007 and strengthened by Décret	None

Legislation	Provisions as Written	Alignment with PforR Core Principles	Gaps against PforR Core Principles
009 (Child Labor Regulations)	activities to protect their health, safety, and development. Children aged **15 and above** may be employed **only for light work**, meaning activities that: • do not exceed their physical strength, • do not involve dangerous conditions, • do not harm their physical, mental, moral, or social development, and • do not compromise school attendance, vocational guidance, or training programs. The decrees **prohibit children from working** on construction sites or any workplace where **vehicles, mobile machinery, or machines capable of causing accidents** are used. Children are also **forbidden from working in environments where pesticides are handled**. In the agricultural sector, any task that exceeds the physical capacity of a child—such as plowing, sowing, transplanting, weeding, or harvesting—is considered hazardous and therefore prohibited. In addition to defining permitted and prohibited work, the decrees introduce **community-level oversight responsibilities**. Fokontany authorities must **conduct a census of all children** in their jurisdiction to identify those exposed to risks. Chiefs of Fokontany are legally obliged to **inform administrative authorities** when at-risk children are identified, enabling activation of the social protection network.	n°2018-009 is well aligned with the CP1 and 3,. These decrees regulate the type of work that children may undertake and provide explicit prohibitions to protect minors from hazardous or harmful labour. These child labour decrees are directly relevant to ASCENT Madagascar, particularly because Program implementation involves contractors, community workers, service providers, and field-based operations that may take place near rural communities and vulnerable households.	
Ordinance n°62-023 (Expropriation for Public Utility	Ordinance n°62-023 of 19 September 1962 establishes the legal framework governing expropriation for public utility, amicable acquisition of property by the State, and recovery of land value increases resulting from public works. The ordinance specifies that expropriation may only occur when justified by a déclaration d'utilité publique (DUP), issued through a decree of the Council of Ministers, and only following a formal procedure established in the text. It provides a non-exhaustive list of operations for which expropriation may be undertaken, including the construction of roads, railways, ports, public facilities, irrigation works, sanitation projects, energy distribution systems, land development, urban renovation, and the protection of historical sites. The ordinance requires that the expropriation process begin with a public administrative inquiry—including a commodo et incommodo investigation—in order to identify the parcels affected, their owners, and any persons eligible for compensation. This inquiry must be officially announced in the Journal officiel and displayed at local administrative offices, ensuring full transparency and public participation. Expropriation can only be pronounced by judicial authority, reinforcing the procedural safeguards associated with property rights. The text also regulates the conditions for amicable acquisitions and the State's right to recover land value gains (plus-values foncières) generated by public improvements	Ordonnance n°62-023 aligns closely with theCP4—as it establishes clear procedural safeguards for expropriation, including public utility justification, prior public disclosure, stakeholder consultation, and judicial oversight. Its requirement for a public inquiry mirrors principles of transparency, meaningful consultation, and documentation of affected people and assets. The ordinance covers eligibility and formal identification of rights holders supports standards on fair, lawful, and equitable compensation. ASCENT activities may intersect with land-use planning, infrastructure development, or technical support to ministries and local governments, where land acquisition issues could arise.	1. Definition of eligible affected persons • **1. Recognition of affected persons** • **CP4** requires that land acquisition and loss of access to land or natural resources be managed in a manner that **identifies and assists all affected persons**, including those experiencing **economic displacement**, regardless of the legality of tenure. • **National practice** focuses primarily on **formally recognized landowners**, while several modalities

Legislation	Provisions as Written	Alignment with PforR Core Principles	Gaps against PforR Core Principles
			(e.g. right-of-way clearance, preemption, temporary land availability, voluntary donation) do not consistently recognize or protect **informal occupants and users**. • **Gap**: Affected persons without formal land titles are **not systematically identified, consulted, or assisted**, which is inconsistent with CP4 requirements. **Compensation and assistance standards** • **CP4** requires that affected people be **assisted in improving or at least restoring their livelihoods and living standards**, including through adequate compensation and transitional support. • **National law** provides compensation mainly based on **market value and damages** in cases of expropriation, which may fall below full replacement needs; some land acquisition modalities provide **no financial compensation**.

Legislation	Provisions as Written	Alignment with PforR Core Principles	Gaps against PforR Core Principles
			• **Gap**: There is **no systematic obligation to ensure compensation and assistance sufficient to restore livelihoods and living standards**, as required under CP4. **Livelihood restoration** • **CP4** explicitly requires that program systems **assist affected people in improving or restoring livelihoods**, not merely compensate assets. • **National frameworks** have **limited provisions** for livelihood restoration, and commonly applied modalities (e.g. pre-emption, temporary availability, long-term leases) do not integrate livelihood restoration measures. • **Gap**: **Livelihood restoration is not explicitly guaranteed or operationalized** across land acquisition instruments. **4. Avoidance and minimization of displacement** • **CP4** emphasizes **avoidance and minimization of displacement** as a core

Legislation	Provisions as Written	Alignment with PforR Core Principles	Gaps against PforR Core Principles
			principle of land acquisition management. • **National practice** allows voluntary and negotiated approaches, but in practice displacement may occur **without documented analysis of alternatives** or justification (e.g. early expropriation, automatic pre-emption). • **Gap**: The **avoid–minimize–assist hierarchy** embedded in CP4 is **not consistently applied or documented**. **5. Consultation, participation, and grievance redress** • **CP4** requires that affected persons be **consulted**, informed, and provided with **accessible grievance redress mechanisms** related to land acquisition and displacement. • **National approaches** include participatory mechanisms in some cases, but others rely on **informal or weakly documented consent**, and grievance mechanisms are **not systematically mandatory**.

Legislation	Provisions as Written	Alignment with PforR Core Principles	Gaps against PforR Core Principles
			• **Gap**: **Consultation, consent documentation, and grievance redress are unevenly applied**, falling short of CP4 expectations. **6. Attention to vulnerable groups** • **CP4** requires that land acquisition systems **identify and assist vulnerable groups** to avoid disproportionate adverse impacts. • **National practice** occasionally acknowledges vulnerability, but **no consistent framework** exists to ensure enhanced support or monitoring for vulnerable groups. • **Gap**: **Targeted measures for vulnerable affected persons are not systematically required**. **7. Documentation, transparency, and traceability** • **CP4** requires **transparent, documented, and traceable land acquisition processes**, including records of consultations, agreements, compensation, and assistance.

Legislation	Provisions as Written	Alignment with PforR Core Principles	Gaps against PforR Core Principles
			• **National systems** document formal expropriation processes but rely heavily on **informal or locally negotiated arrangements** for other modalities. • **Gap**: **Inconsistent documentation and limited traceability** across land acquisition approaches undermine CP4 compliance.
Decree No. 2025-165: the implementation of Ordinance No. 62-023	establishes the **detailed modalities for implementing Ordonnance n°62023 of 19 September 1962**, which governs expropriation for public utility, amicable acquisition of immovable property by the State or decentralized public entities, and the recovery of land value gains resulting from public works. As confirmed by decree n°2025822, the decree operationalizes the procedural steps required for lawful expropriation, including the preparation and issuance of a **Declaration of Public Utility (DUP)**, the conduct of administrative and public inquiries, parcel identification, compensation processes, and coordination between the relevant ministries and decentralized authorities**-023 of 19 September 1962**-822, the decree operationalizes the procedural steps required for lawful expropriation, including the preparation and issuance of a The decree specifies the responsibilities of administrative bodies in charge of expropriation, establishes timelines and required documentation, and clarifies the steps for notification, compensation eligibility verification, surveying and mapping requirements, and issuance of the administrative deed of transferability *(acte de cessibilité)*. It also details mechanisms for amicable acquisition, rules for valuation of affected assets, and financial procedures for compensation payment. The overarching purpose of Décret n°2025165 is to ensure **transparent, orderly, and legally compliant implementation** of Ordonnance n°62023 throughout all stages of expropriation or land acquisition for public interest projects-165 is to ensure -023 throughout all stages of expropriation or land acquisition for public interest projects	ASCENT Madagascar may support public sector institutions whose mandates involve land related operations, infrastructure planning, or activities requiring access to land sector institutions whose mandates involve land-related operations, infrastructure planning, or activities requiring access to land sector institutions whose mandates involve land related operations, infrastructure planning, or activities requiring access to land-sector institutions whose mandates involve land-related operations, infrastructure planning, or activities requiring access to land	Aligns strongly with the **CP4, except it article 53 stating non eligibility for compensation for public domain, reserves of rights of way**. Its requirement for public utility justification, administrative and public inquiries, and formalized compensation procedures reflects CP4 principles of **due process, consultation, transparency, and fair compensation**.

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Legislation	Provisions as Written	Alignment with PforR Core Principles	Gaps against PforR Core Principles
Decree No. 2025-822: the implementation of Ordinance No. 62-023	ecree n°2025822 modifies and updates provisions of **Decree n°2025165 on 18 février 2025**, which sets the modalities for implementing **Ordonnance n°62023 on 19 September 1962** on expropriation for public utility, amicable acquisition of immovable property by the State or decentralized entities, and recovery of land value increments. The decree redefines administrative responsibilities and procedures related to the expropriation process, adjusting specific articles—including Article 53—to clarify steps in parcel identification, issuance of the administrative deed of transferability *(acte de cessibilité)*, and compensation related administrative operations-822 modifies and updates provisions of **-165 -023** -related administrative operations	This decree addresses the gap of the article 53 of the above decree 2025-165 and make eligible for compensation any settlements within the public domain reserves	None
Law No. 2005-019: the status of land.	establishes the **general legal framework governing land status in Madagascar**, defining the different categories of land, their legal regimes, and the principles guiding land tenure and land management. The law is rooted in the national *Land policy paper (Lettre de Politique Foncière)* and the National Land Programme *(Programme National Foncier)*, aiming to modernize, decentralize, and simplify land administration. It provides an extensive list of definitions to clarify technical land related vocabulary, then classifies land into three main categories: **(i)** public and private domains of the State, decentralized collectivities, and public entities; **(ii)** private lands held by natural or legal persons; and **(iii)** lands located within areas subject to special protection regimes.-related vocabulary, then classifies land into three main categories: A major innovation of the law is the **recognition of occupation and use rights as a form of property**, particularly for long-term occupation of non-titled land that was previously presumed to belong to the State.	ASCENT works across sectors that interact directly with land administration, territorial planning, and project siting. Ensuring consistency with Loi n°2005019 is therefore essential for the Program's land related due diligence.-.	None
aw n°2008-013: public domain	establishes the legal regime governing the public domain of the State and decentralized territorial authorities in Madagascar. The law redefines the public domain following the abolition of the presumption of domaniality introduced by Loi n°2005-019 and clarifies the classification, composition, and legal status of public assets. The public domain includes all immovable property that, due to its nature or its assigned public purpose, serves the use, protection, or enjoyment of all and cannot be privately owned. The law distinguishes three categories of public domain: natural public domain (e.g., territorial sea, beaches, rivers, lakes), artificial public domain (infrastructure and assets created by human intervention), and regulatory public domain, resulting from official classification procedures.	In line with CP4, through its clear definition of protected public assets, land-use restrictions, and conservation obligations. By setting strict legal conditions for the use and protection of natural public assets—such as watercourses, beaches, lakes, rivers, and the coastal protection strip ASCENT Madagascar may involve operations requiring access to land.	None

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Legislation	Provisions as Written	Alignment with PforR Core Principles	Gaps against PforR Core Principles
Law n°2008-01 : private domain of the State)	establishes the legal framework governing the **private domain of the State**, decentralized territorial authorities, and public legal entities. The law was introduced to harmonize national land legislation following the abolition of the presumption of domaniality and the creation of non-titled private property under Loi n°2005-019 The law defines the private domain as assets susceptible to private ownership due to their nature or their assigned purpose, distinguishing between affected property (used for public services) and non-affected property (available for management, transfer, or concession). It provides rules for the constitution, management, conservation, transfer, and litigation of State-owned private land.	The law's clear categorization of public vs. private land, its procedural safeguards for the transfer or concession of State-owned land, and its requirements for conditions of land development all reinforce CP4 principles related to legality, transparency, and recognition of tenure arrangements. ASCENT Madagascar may involve operations requiring access to land.	None

Legislation	Provisions as Written	Alignment with PforR Core Principles	Gaps against PforR Core Principles
ENERGY SPECIFIC ACTS/LEGISLATIONS			

Legislation	Provisions as Written	Alignment with PforR Core Principles	Gaps against PforR Core Principles
Law n°98-032: reform and modernization of Madagascar's electricity sector	establishes the legal framework for the **reform and modernization of Madagascar's electricity sector**, redefining institutional roles and opening the sector to new forms of management and participation. The law reorganizes the production, transmission, and distribution of electrical energy; sets the legal basis for **liberalization and private sector involvement**; and defines the responsibilities of public authorities in planning, regulating, and overseeing the sector. It establishes the **legal regime applicable to electricity operators**, including concessionaires, permit holders, and entities involved in the production or commercialization of electrical energy. This reform law is closely linked to the broader national efforts in the late 1990s to modernize infrastructure sectors and improve access to reliable electricity services Defines core obligations related to quality of service, tariff regulation, safety conditions, and environmental compliance for any operator or concessionaire. It clarifies the role of the State in ensuring energy supply, establishes the mechanisms for granting concessions or authorizations for electricity production and distribution, and sets the foundations for sector specific decrees and regulatory bodies.	In line with CP3 by establishing technical, safety, and regulatory standards for electricity infrastructure, the law reinforces CP3 principles concerning operational safety, management of electrical hazards, and protection of communities and workers. Its requirements for concessionaires and operators to comply with environmental rules (through sectoral decrees and the MECIE system) support CP1's emphasis on early identification and mitigation of environmental and social risks associated with energy production, transmission, and distribution. The institutional obligations placed on electricity operators to ensure reliability, quality, and safety also contribute indirectly to CP1 and 6 by strengthening governance, service accountability, and user protection mechanisms.	None
Décret n°2001173 (Application of the Electricity Sector Reform Law)	establishes the **rules, procedures, and administrative modalities** for implementing **Loi n°98032 du 20 janvier 1999**, which reformed Madagascar's electricity sector. The decree regulates the **granting, transfer, renunciation, termination, and competitive award** of concessions and authorizations for electricity infrastructure, including the construction and operation of **production, transmission, distribution, and self production installations**. It defines the rights and obligations of concessionaires and permit holders, and sets out the government's supervisory functions within the restructured electricity sector. On **land occupation**, Article 37 provides that land needed for construction, protection, and operation of electricity installations may be: • public or private land belonging to the State or Local Authorities, or • private land owned by individuals. In the case of private land, the decree requires a **mutually agreed settlement** between the concessionaire/permit holder and the landowner; failing agreement, the State may resort to **expropriation for public utility** in accordance with the legislation in force (Ordonnance n°62023). The decree also specifies that land allocation decisions are issued by the Minister in charge of Domains. Furthermore, Article 41 states that **temporary occupation** of private land outside the concession area	ASCENT Madagascar may involve operations requiring access to land. Aligns closely with the **CP4 (Land Acquisition and Involuntary Resettlement)**, **CP1 (Environmental and Social Sustainability)**, and **CP6 (Social Conflict and Equity)**. By requiring **amicable negotiation** with private landowners for permanent or temporary land occupation, the decree supports CP4 principles on minimizing involuntary land acquisition and ensuring voluntary, transparent agreements whenever possible. Its provisions for **formal expropriation procedures** only as a last resort align strictly with CP4 requirements for due process, public interest justification, and fair compensation consistent with Ordonnance n°62023.	None

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Legislation	Provisions as Written	Alignment with PforR Core Principles	Gaps against PforR Core Principles
	must be negotiated amicably between the concessionaire and landowners for activities related to construction, operation, maintenance, or access to installations.		
Décret n°64013 (Réglementation des opérations d'énergie électrique à usage public)	establishes the **general regulatory framework governing public use electricity operations in Madagascar**, including installations for **production, transport, and distribution** of electrical energy. The decree defines the rights and obligations of electricity operators and concessionaires, particularly the **servitudes** that may be exercised vis-à-vis third parties during construction, operation, and maintenance of electrical infrastructures. Article 8 authorizes new or existing concessionaires, subject to legal and contractual compliance, to: • conduct necessary works on or under the public domain, • install supports and anchorage systems on private buildings (walls, roofs, façades) for lowvoltage conductors, • route aerial conductors over private properties at safe distances, • install permanent aerial supports on undeveloped private lands (up to 1 m² footprint), • cut trees or branches threatening electrical installations, • and, where required, request **expropriation** following a Declaration of Public Utility. The decree specifies that such servitudes **do not constitute dispossession**, though they may give rise to compensation agreed upon between parties. Article 12 further rules that no work aggravating an authorized servitude may be undertaken without the written consent of the landowner or the formal procedures required for servitude establishment. Major maintenance or renewal works require an 8day prior notice to the owner, except in emergencies, where written authorization from the General Electricity Inspectorate must be provided to local authorities.	The decree's treatment of servitudes as **non-dispossessory rights** that may nonetheless require compensation is consistent with CP4 principles on minimizing involuntary land acquisition and ensuring fair, negotiated outcomes. Its provisions requiring landowner consent for aggravated servitudes, formal procedures for expropriation, and notification obligations	None
Décret n°60294 (Technical Conditions for Public Electricity Distribution)	establishes the **technical rules and conditions** applicable to the design, construction, operation, and maintenance of **public electricity distribution installations** in Madagascar. The decree states that all distribution works must comply with the *rules of the art* to ensure: • the maintenance of natural water flow, • access to houses and properties, • protection of telecommunications systems, • safety and convenience of traffic on public roads, • protection of plantations and landscapes, and • safety of public services, operational personnel, and residents of affected communes. Although highly technical, the decree clearly has **environmental and social objectives**, since the design and placement of electrical infrastructure must avoid obstructing watercourses, degrading landscapes, damaging crops, or creating safety risks for communities.	The requirement for compliance with professional technical norms and the detailed specifications for crossings, supports, and proximity to other networks reinforce CP1's emphasis on risk identification, engineering safety, and prevention of adverse environmental and social impacts. Provisions ensuring protection of plantations, landscapes, and waterways also align with **CP2 (Natural Habitats and Physical Cultural Resources)** in contexts where distribution lines may interact with natural or agricultural environments.	The decree sets technical standards but does not require project-level environmental and social assessment instruments (ESIAs/ESMPs), risk classification, cumulative impact analysis, or explicit application of the mitigation hierarchy

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Legislation	Provisions as Written	Alignment with PforR Core Principles	Gaps against PforR Core Principles
	The decree establishes **technical norms** for a wide range of infrastructure components, including: aerial supports, insulators, conductors, mechanical resistance of lines, underground cable installation, pipeline proximity, transformer posts, overhead and underground service connections, river and canal crossings, railway crossings (main and secondary networks), and the protection of telecommunication lines. It devotes an entire Title (Title III) to **rural electricity distribution installations**, allowing the Minister of Energy to authorize **derogations** for specific rural contexts where strict compliance may not be feasible. Such flexibility is intended to facilitate the expansion of electrification into underserved areas.		(avoid–minimize–restore–offset), all of which are core to CP1. It also lacks explicit requirements for monitoring and adaptive management across the project lifecycle No provisions for non-discrimination/equal opportunity, worker-specific grievance mechanisms, contractor OHS management beyond electrical safety, and measures against child/forced labor and SEA/SH—that are all required under CP3 While technical clearances and safety are covered, there is no requirement for community risk assessments, emergency preparedness and response planning, security personnel risk management, and SEA/SH risk mitigation—core elements of CP3\ screening to avoid natural/critical habitats; vegetation management protocols; invasive species control;

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Legislation	Provisions as Written	Alignment with PforR Core Principles	Gaps against PforR Core Principles
			offsets only as last resort
Décret n°62535 (Technical Conditions for Electrical Installations)	sets the technical conditions applicable to electricity distribution installations in Madagascar. This amending decree introduces a **classification of electrical distribution works into three voltagebased categories**, establishing differentiated technical requirements depending on the maximum voltage handled by the infrastructure: • **1st category:** installations operating at voltages **≤ 430 volts (AC)** or **≤ 600 volts (DC)**; • **2nd category:** installations operating at voltages between the limits above and **below 57,000 volts**; • **3rd category:** installations operating at voltages **equal to or exceeding 57,000 volts**. This classification is intended to ensure that the design, construction, maintenance, and safety standards required for electrical installations are proportionate to the voltage levels they carry—thereby guaranteeing safer infrastructure operation and harmonizing technical standards with evolving electrical engineering practices of the period.	Its engineering safety focus (design standards, clearances, crossings, interface with other networks) is directionally consistent with CP1-3 principles to identify and prevent risks and protect communities and the environment Core gap: CP requires a comprehensive, lifecycle E&S risk management system with defined instruments and engagement processes coveringthe broader scope of social risk management, labor, land, biodiversity, cultural heritage, and stakeholder engagement requirements	None

Lettre de Politique de Développement de la Cuisson Propre (2025–2035)	• Purpose and scope:
	  ○ Sets the Government of Madagascar's high-level vision and commitment to accelerate the transition to clean cooking to address deforestation, household air pollution, and poverty impacts.
	  ○ Frames clean cooking as multisectoral (energy, environment/forestry, health, finance, industry, gender).
	• Main provisions and commitments (illustrative figures from the letter):
	  ○ Scale-up to roughly 3.5 million households by 2030 (about 50% access).
	  ○ Reduce woodfuel use and deforestation; improve health outcomes; create green jobs.
	  ○ Establish a national M&E system aligned with the World Bank's Multi-Tier Framework (MTF).
	• Binding force:
	  ○ Non-binding policy statement. As a "Lettre de Politique," it expresses official intent and direction, not enforceable obligations. It notes government approval (political endorsement) and anticipates drafting/adopting laws and decrees to implement its goals. Any obligations on third parties would come from subsequent legislation/regulation, not from the policy letter itself.
		• Strong alignment on 6 core principles : the letter and the strategy diagnose environmental and social risks from traditional cooking, apply a mitigation hierarchy by prioritizing cleaner fuels/technologies, set quantified pollution and GHG-reduction targets, commit to protecting and restoring forests, and elevate community health and safety (e.g., national standards for LPG/electric equipment), all under a defined monitoring and evaluation framework with KPIs and phased reviews.
		• Inclusive, multi-stakeholder implementation consistent with CP6 and partially with CP3: they establish coordinated governance (interministerial/agency structures),
			the letter and the strategy express intent and direction, not enforceable obligations. Binding force would derive from the future law(s), decrees, standards, and financing instruments it calls for.

Legislation	Provisions as Written	Alignment with PforR Core Principles	Gaps against PforR Core Principles
		emphasize broad stakeholder engagement and public awareness, promote transparency through data and reporting, and advance market formalization, capacity building, and job creation—supported by training/certification and a feedback/complaints channel—providing a foundation for labor and OHS enhancements during implementation.	

Stratégie et Plan d'Actions Opérationnel de la Cuisson Propre (2025–2035)	• Purpose and scope: Operationalizes the policy letter into a detailed roadmap with actions, budgets, roles, timelines, KPIs, and risk mitigation.
	• Timeframe and targets:
	  ○ 2025–2035, with phased milestones (short term 2025–2027; medium 2028–2030; long 2031–2035).
	  ○ Confirms 50% access by 2030; aims for universal access by 2035.
	  ○ Breaks down technology pathways (illustrative distribution by 2035): LPG (1.8M households), electricity (1M), pellets/gasifiers (1.8M), improved biomass stoves as transition (2.5M), ethanol (0.6M), biogas (100k units).
	• Regulatory and market measures:
	  ○ Draft and adopt a dedicated clean cooking law and implementing decrees; update/issue product and fuel standards; set incentives (fiscal/tariff).
	  ○ Build local supply chains and infrastructure (e.g., LPG filling, ethanol/biofuel production, pellet plants).
	  ○ Establish a national testing/certification lab (ISO-aligned); develop consumer finance and RBF mechanisms.
	• Risks and mitigation:
	  ○ Financing and capacity constraints (mitigated by fund creation, partner engagement, capacity building).
	  ○ Governance/coordination risks (mitigated by dedicated agency and COPIL).
	  ○ Market adoption and affordability (mitigated via incentives, consumer finance, awareness).
	  ○ Supply reliability and climate shocks (mitigated via diversified fuels, local production, risk mapping).
	• Binding force:		

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Legislation	**Provisions as Written**	**Alignment with PforR Core Principles**	**Gaps against PforR Core Principles**
	○ Non-binding strategy/plan. It is an implementation roadmap proposing actions and future legal instruments. It does not itself create legal obligations; binding force would derive from the future law(s), decrees, standards, and financing instruments it calls for •		

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14.1 Annex 2: List of Stakeholders Consulted during the ESSA Process

MINISTERE DE L'ENERGIE ET DES HYDROCARBURES

MINISTERE DU DEVELOPPEMENT NUMERIQUE, DES POSTES ET DES TELECOMMUNICATIONS

PROJET DIGITAL AND ENERGY CONNECTIVITY FOR INCLUSION IN MADAGASCAR (DECIM)

UNITE DE COORDINATION DU PROJET

FICHE DE PRESENCE

Projet	**PROJET DIGITAL AND ENERGY CONNECTIVITY FOR INCLUSION IN MADAGASCAR**
Activité	ASCENT MADAGASCAR
Motif de la Réunion	Atelier de préparation

Lieu	Ampefy - PAULONNIA	**Date**	10/02/26
		Heure	

N°	Nom	Organisation	Contact mail et Téléphone	Signature
01	RANDRIANOMANJAHANAG Ginot duc	DECIM	0346270086 eaeleca@decim.mg	
02	RAJAONARIVELO Laurent	DECIM	0321146330 spotse@decim.mg	

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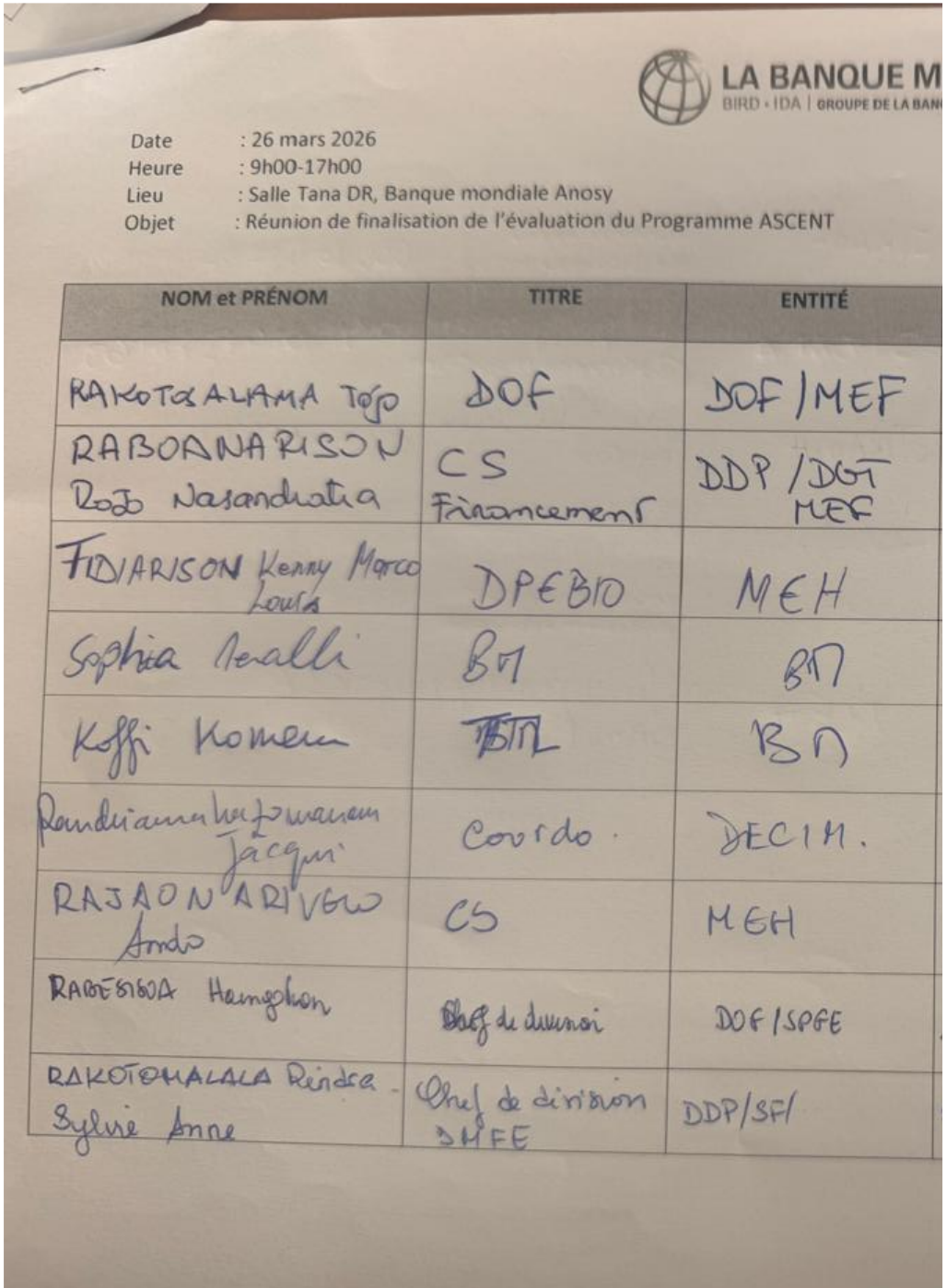
	Nom	Organisation
03	Nicaise Hamgato Robinson	MEF/DDP
04	RAJAONARISINA Nirintsoa	MEF/DDP/SO
05	RAZAFINDRATSIRA Mimosa Armelle	MEF/DDP/SPGD
06	RAVELOARISON Tantelinjaina	MEF/DGBF/DBI SSPI
07	FIDIARISON Kenny Marco Louis	MEH/DPEPIO
08	RAZAFINAHATRATRA Dina Anjaranjaina	MEH/DEE
09	Romuald [illegible]	WB.
10	Daniela RAKOTONANDRASY	W.B
11	Koffi Komenan	WB
12	Maharavo RAMAROTAHIANTSOA	WB
13	RAZAFINDRATSIMBA Hasina Jerson	WB

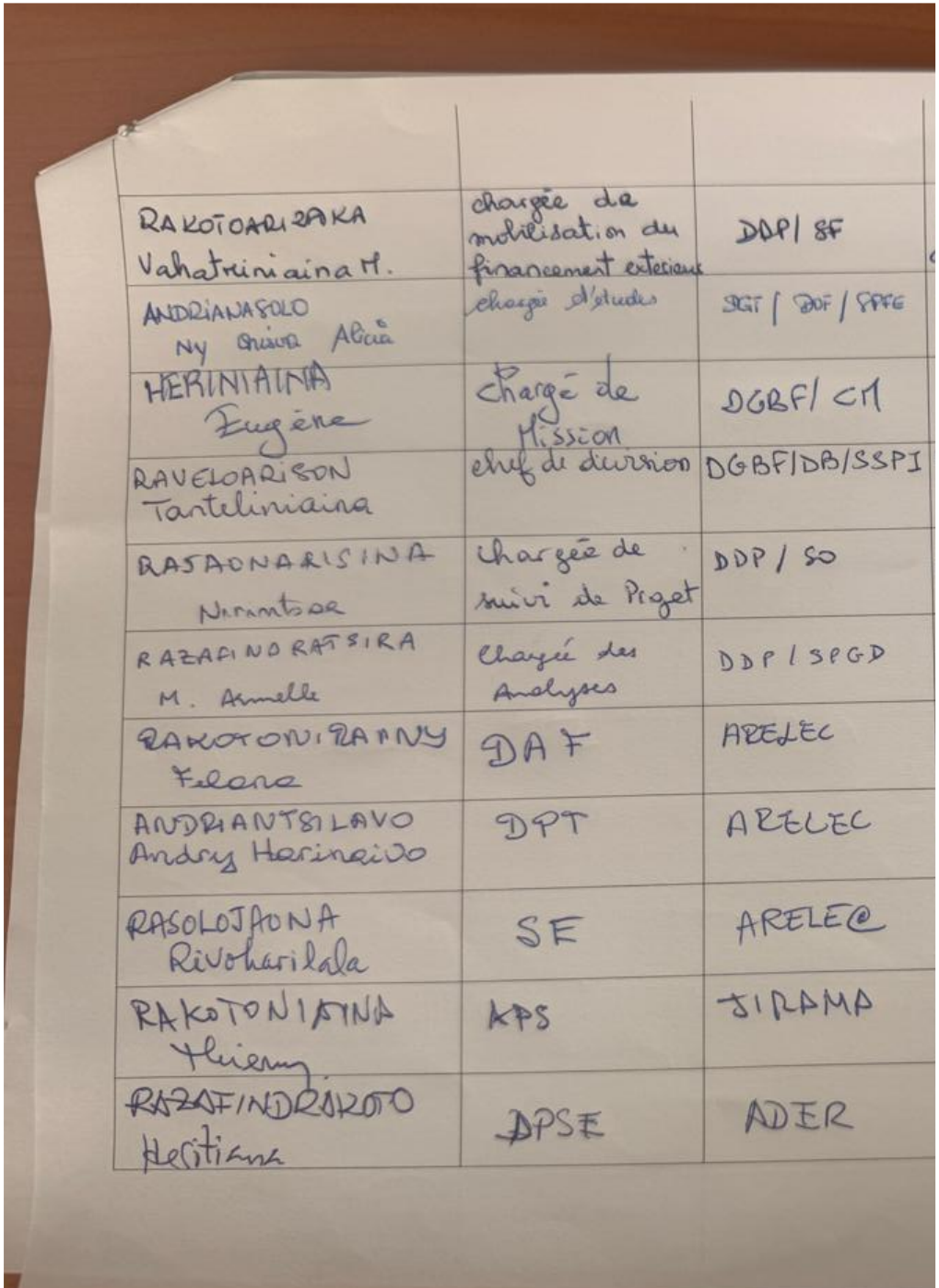
	Nom	Organisation
14	ANDRIANTSARA Ratsiba Nandimbilaza	ARELEC
15	RAKOTONIRAINY Feleone	ARELEC
16	RAKOTONIAINA Thierry	JIRAMA
17	RAJAONARIVONY Félinandrasana	JIRAMA
18	RAZAFINDRAKOTO Hortizina	ADER
19	RAMEROSOA Riana	DECM.
20	RABOBIAZANAKA Tolotson	DECM
21	RANARISON Léonie	DECM
22	RAZAFIMAHALEO Mamy Andrianantenaina	DECM
23		
24		



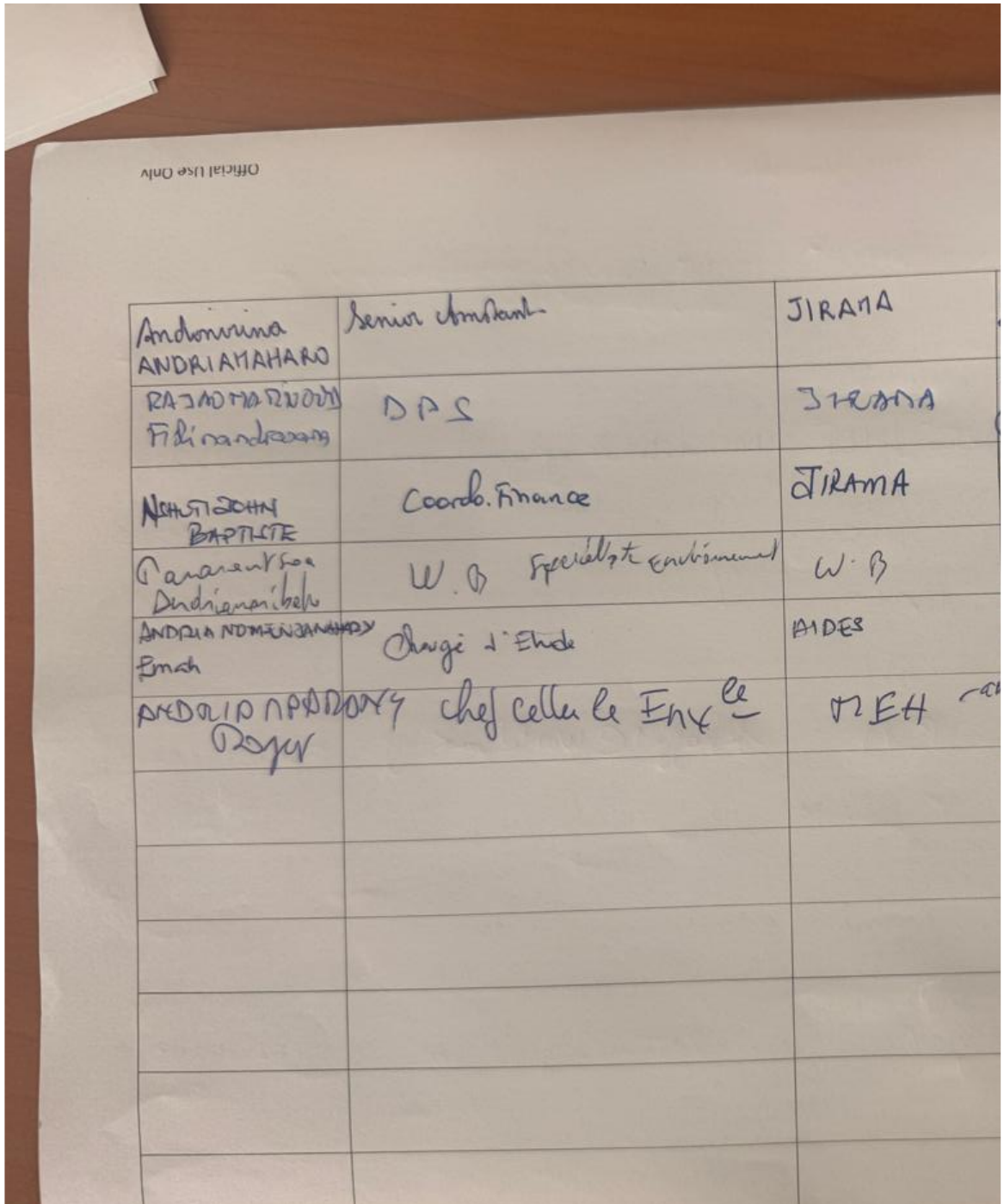
LA BANQUE M
BIRD • IDA | GROUPE DE LA BAN

Date : 26 mars 2026
Heure : 9h00-17h00
Lieu : Salle Tana DR, Banque mondiale Anosy
Objet : Réunion de finalisation de l'évaluation du Programme ASCENT

NOM et PRÉNOM	TITRE	ENTITÉ
RAKOTOALAMA Tojo	DOF	DOF/MEF
RABOANARISON Rojo Nasandratia	CS Financement	DDP/DGT MEF
FIDIARISON Kenny Marco Louis	DPEBIO	MEH
Sophia Nerilli	BM	BM
Koffi Komena	TBTL	BM
Randriamanantsoa Jacqui	Coordo.	DECIM.
RAJAONARIVELO Andry	CS	MEH
RABESIOA Hasinjohn	Chef de division	DOF/SPGE
RAKOTOMALALA Rindra Sylvie Anne	Chef de division DMFE	DDP/SFI



RAKOTOARIZAKA Vahatriniaina M.	chargée de mobilisation du financement extérieur	DDP/ SF
ANDRIANASOLO Ny Aniva Abcia	chargé d'études	SGT / DOF / SPFG
HERINIAINA Eugène	Chargé de Mission	DGBF/ CM
RAVELOARISON Tantelinjaina	chef de division	DGBF/DB/SSPI
RASAONARISINA Nirantsoa	Chargée de suivi de Projet	DDP / SO
RAZAFINORATSIRA M. Amelle	Chargée des Analyses	DDP / SPGD
RAKOTONIRAINY Felana	DAF	ARELEC
ANDRIANTSILAVO Andry Harinaivo	DPT	ARELEC
RASOLOJAONA Rivoharilala	SE	ARELEC
RAKOTONIAINA Thierry	APS	JIRAMA
RAZAFINDRAKOTO Hasitiana	DPSE	ADER



Andonirina ANDRIAMAHARO	Senior Assistant	JIRAMA
RAJAONARIVONY Fidimandresena	DPS	JIRAMA
NEHUSTI JOHN BAPTISTE	Coordo. Finance	JIRAMA
Ganarentsoa Andrianaivoharivelo	W.B Specialiste Environnement	W.B
ANDRIA NOMENJANAHARY Fanah	Chargé d'Etude	AIDES
ANDRIANAIVOARIVONY Rojer	chef cellule Env	MEH

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14.2 Annex 2 (a): List of Stakeholders involved in consultations on the ESSA Report

Name	Unit
Razafindrakoto Heritiana	ADER
Andriantsara Rabike Mandimbilaza	ARELEC
Rakotonirainy Felana	ARELEC
Randrianomenjanahary Ginot Luc	DECIM Project
Rajaonarivelo Laurent	DECIM Project
RAmerison Riana	DECIM Project
Rabarilala Tahirisoa	DECIM Project
Ranarison Léonie	DECIM Project
Razafimanantsoa Mamy Andrianantenaina	DECIM Project
Rakotondrazananay Norohanta Emilda	Directorate of Expropriation / Ministry of Land Use Planning and Land Services
Herman Raveloson	DQHSE JIRAMA
Lalaina Rasandifera	DQHSE JIRAMA
Lala Nirina Rakotoarimino	DQHSE JIRAMA
Adrienne Rovololomanana	DQHSE JIRAMA
Jean Jacques Rakotoniaina	DQHSE JIRAMA
Abel Razafindrasata	DQHSE JIRAMA
Ange Simonia INGY	General Director for Employment Promotion, Ministry of Labor, Employment, and Social Laws
Rakotoniaina Thierry	JIRAMA
RAjaonarivony Fidinandrasana	JIRAMA
Fidiarison Kenny Marco Louis	Ministry of Energy and Hydrocarbon
Razafimahatratra Dina Anjaraniaina	Ministry of Energy and Hydrocarbon
Miandrainjato Robinson	Minsitry of Finance
Rajaonarisina Nirintsoa	Minsitry of Finance
Razafindratsira Minosoa Armelle	Minsitry of Finance
Raveloarison Tanteliniaina	Minsitry of Finance
Rindra Harizo Randriamahefarilala	ONE National Environmental Agency
Hoby Rajaonson	ONE National Environmental Agency
Marie Louise Schmidt Rasoamanahirana	Biogasikara Energy SARL
Borice Nirinaharinjato	ANKA Madagascar SARL
Emah Andrianomenjanahary	AIDES- Appui Aux Investissements Durables
Volatiana Claudia Tombotsiory	MADAVANCE
Léa Rasolofoson-Rajaonah	MADAVANCE

[i] Further details of possible sub-project activities related to each of these categories is provided in Table 31.

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