Concept Environmental and Social Review Summary

Concept Stage

(ESRS Concept Stage)

Date Prepared/Updated: 01/27/2022 | Report No: ESRSC02540

BASIC INFORMATION

A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
Comoros	AFRICA EAST	P177646	
Project Name	Comoros Solar Energy Access Project		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Energy & Extractives	Investment Project Financing	4/4/2022	5/25/2022
Borrower(s)	Implementing Agency(ies)		
Government of Union of Comoros	Ministry of Energy, Water and Hydrocarbons		

Proposed Development Objective

Improve the operational performance of the electric utility and its ability to supply renewable energy.

Financing (in USD Million)	Amount
Total Project Cost	40.00

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

No

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

The Project Development Objective is to Improve the operational performance of the electric utility and its ability to supply renewable energy and energy storage facilities to the Comorian power generation mix.

The above objective will be achieved through the establishment of a robust technological and institutional platform for the expansion of solar PV energy and the deployment of a 'batch" of off- and on-grid solar PV and storage technology on all three Islands. Thus, the project will support a first, major step toward improving the quality of energy services and easing budgetary pressure on the GoC's finances through the progressive diversification of the country's diesel-powered generation infrastructure.

The project has four components :
Component 1: Investment in Power Storage, Photovoltaic (PV) , and System Upgrades (US$26 million)

- PV plant on Grande Comore, Anjouan and Moheli. This component will finance at least 9 MWp of PV at some of the 11 prospective solar sites identified as part of project preparation. Cost estimates will be reviewed and updated based on the most recent experience in deploying solar power in similar context.
- Battery storage on Grande Comore, Anjouan and Moheli. This component will install stand-alone battery storage (i) on Grande Comore to ensure that additional expected PV generation (9 MWp from this project and 3MWp from the Innovent project currently under construction) will be accompanied by adequate storage capacity; (ii) on Anjouan (3MWh), and (iii) on Moheli (1MWh) to ensure proper management of solar and thermal generation on the islands.
- System upgrades, rehabilitation, and automation. To ensure the stability of the power system on the three islands, reduce outages, and improve overall quality of electricity supply, this component will also include investments in the power transmission network and maintenance of selected power generation units, dispatching center.

Component 2: SONELEC Commercial and Operational Recovery (US$6 million equivalent)

- Subcomponent 2.1: Geographical expansion and enhancements of SONELEC's (Société Nationale de l'Electricité des Comores) Commercial Management System (CMS). The former Bank energy engagement Energy Sector Recovery Project (ESRP) closed in April 2018 has financed the implementation of a state-of-the-art hardware and software infrastructure for SONELEC's new CMS covering all customers on Grande Comore and Mohéli to ensure the streamlining of billing and collection activities and fully integrating the new prepaid metering infrastructure. Comoros Solar Energy Access Project (CSEAP) would fund the rollout of the same CMS in Anjouan, extend the expired maintenance guarantee of hardware and software for another three years until SONELEC is fully capable of maintaining the system on its own, and add critical additional features and modules such as mobile payment. This will also include upgrading the system put in place through the ESRP to reflect the recent separation of the utility into separate water (Société Nationale d'Exploitation et de Distribution des Eaux - SONEDE) and electricity (SONELEC) entities.
- Subcomponent 2.2: Rollout of advanced metering infrastructure. The project will support the mainstreaming of prepaid meters by installing 48,000 additional split-type meters on all three islands, which will have a considerable impact on strengthening the sustainability of SONELEC's revenues and cash flow.

Component 3. Technical Assistance (US$8 million equivalent)

- Subcomponent 3.1: Project implementation support. This subcomponent will finance a well-staffed Project Implementation Unit (PIU) to support the project implementation and the recruitment of owner's engineers and specialized consultancies for Component 1 and 2.
- Subcomponent 3.2: Training and capacity building in transmission and dispatch system operations and maintenance. The project will support the transition from SONELEC's current short-term-oriented approach that restricts private sector participation to the implementation of turnkey contracts for the construction of new generation capacity.
- Subcomponent 3.3: Expansion of gender-based communication and awareness campaigns carried out under the recently completed ESRP that succeeded in increasing women's awareness and advocating the value of formal electricity connections and the importance of paying electricity bills.
- Subcomponent 3.4: Technical assistance for sector governance and renewable energy development. The project will provide support to the key energy sector institutions through the hiring of external experts and the provision of training (including workshops) to perform key functions including the following: (i) consolidation of sector

institutional and regulatory framework, and (ii) technical support to SONELEC and DGEME (Direction Générale de l'Énergie, des Mines et de l'Eau)

- Subcomponent 3.5: Geospatial analysis of renewable energy. A preliminary study will be done during the preparation stage of CSEAP and the final study completed in this subcomponent.

Component 4: Contingent Emergency Response Component (US$0 million)
A Contingent Emergency Response Component (CERC) with zero allocation may be used to contribute to an emergency response t hrough the timely implementation of activities in response to an eligible national emergency. The CERC could also be used to channel additional funds should they become available as a result of said emergency. For the Comorian energy sector, emergency conditions may arise subsequent to extreme weather events including cyclones and flooding or economic disruption including fuel import shortages.
The CERC mechanism will be further defined in a CERC Operational Manual attached to the Project Implementation Manual (PIM), which will include triggers and conditions for the use of funds. This manual will clearly outline the triggers, eligible expenditures, and procedures for tapping into the CERC. Should the CERC be triggered, all expenditures will be made in accordance with paragraph 11 of the Investment Project Financing (IPF) Policy and will be reviewed and accepted by the World Bank before any disbursement is made. In accordance with paragraphs 11 and 12 of the IPF Policy, this component would provide immediate, rapidly disbursing support to finance goods (positive list agreed with the Government), works, and services needed for response, mitigation, and recovery and reconstruction. Operating costs that are eligible for financing would include the incremental expenses incurred for early recovery efforts arising from the impact of a major crisis.

D. Environmental and Social Overview

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

The Union of Comoros is a small volcanic archipelago off the coasts of Mozambique and Madagascar with three major islands, Grand Comores, Moheli and Anjouan. Home to the second most diverse coral reefs in the world after Indonesia, Comoros has about 1,800 square kilometers of land and a maritime Exclusive Economic Zone 70 times the size of its land area. About half of its 887,929 population live on Ngazidja, the largest island, where the capital city Moroni is located. While the country is prone to natural disasters (tsunami, cyclones, seismic and volcanic activities), its capacity to respond to emergencies remains weak. Union of the Comoros is an island nation with an estimated population of 832,347 in 2018, of which half of the population is under the age of 15. Typical of small island states, Comoros faces geographical isolation, is densely populated, and has limited resources, a small domestic market, a narrow export base, and a high dependence on food imports and remittances. In comparison with most African countries, Comoros is relatively homogeneous in ethno-linguistic and religious terms. Nevertheless, there are significant socio-cultural differences in Comorian society (mainly between the three islands) that constrain national solidarity and reinforce inter-island political and economic competition. The forest zones of the Comoros are threatened by anthropic pressures and the vegetation has been threatened by tree felling and bush fires. Humans are transforming all vegetation for the benefit of food and food productions. And now the island's vegetation formation is well layered, from bottom to top, but completely humanized and degraded.
All the original vegetation has been transformed into areas of diverse plantations such as coconut trees, mango trees, clove trees, jackfruit trees, breadfruit trees, kapok trees, banana trees, ylang-ylang trees, , etc. The potential sites

selected for photovoltaic installations are mainly composed of savannah, bushes and denuded land with low ecological value.

The proposed project aims to support the improvement of the power company's operational performance and ability to provide renewable energy. The project intervention will take place across all islands of the country. The exact locations of the news activities are not yet well known.
Project activities are relevant to ESF for infrastructure improvement (Component 1), and are anticipated to generate : (i) waste and pollution control, (ii) occupational health and safety during construction and operations; (iii) community health, safety, and security risks, and (iv) social inclusion (Component 2) Technical assistance activities (Component 3) will support the institutional framework and capacity of the Government and relevant ministries, including aspects of E&S risk management. The proposed activities may affect the environment, the populations and whose nature, magnitude and scope are not yet defined in details. Project activities may cause impacts and risks on environment and natural resources which will occur during the construction and the maintenance of solar systems, and construction of PV and mini grids. During the implementation phase, e-waste could be generated in a neighborhood which is not familiar with it. For instance, these solar PV systems will likely need maintenance that involves disposing of old batteries and installing new batteries, and the entire system will need to be disposed at the end of the project life.

D. 2. Borrower's Institutional Capacity

The Project will be managed by a project implementation unit (PIU) created under the Ministry of Energy or SONELEC. PIU will be responsible for overall project oversight including fiduciary compliance, monitoring and evaluation (M&E) and compliance with social and environmental requirements specified by Comoros Law and by WB E&S Standards. However currently this entity doesn't have any capacity to manage the potential environmental and social impacts of the proposed project and is not familiar with Bank ESF standards. A detailed E&S capacity and systems assessment vis-a-vis of all E&S standards will be undertaken during the project preparation following the Bank Guidance Note on Assessing Borrower Capacity at the project level. The client capacity to address environmental and social risks will be further enhanced through the recruitment of qualified E&S specialists. During the preparation of the project, the Bank team will review the environmental and social capacity of the SONELEC and the Ministry of Energy, and identify additional capacity needs, or additional training, necessary prior to project implementation.

II. SCREENING OF POTENTIAL ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC) — Substantial

Environmental Risk Rating — Substantial

The Environmental Risk Classification of the project is substantial at concept stage due, in part to: (i) the expected low institutional capacity of the SONELEC and the Ministry of energy stemming from the unfamiliarity with the new Environmental and Social Framework (ii) the nature and scale of the project activities under Components 1, with the ESF. No irreversible environmental risks and impacts are anticipated at this stage. The proposed activities could potentially induce adverse environmental and social impacts during PV system construction and operation, as well as potential impacts related to the civil works of Central PV, transmission lines and storage systems, including the effects related to: (i) excavations and earthworks with potential vegetation clearing, (ii) deterioration of air quality and noise, (iii) occupational health and safety issues related to civil works, including contamination risk to COVID-19, (iv) liquid waste (used oil) generation inducing the pollution of surrounding area and underground water ; (v) solid waste from the construction phase, (vi) the potential impact of line construction and excavations on cultural

heritage sites,(vii) community health and risks in relation to construction activities, (viii) poor construction-related waste management, (ix) production of e-wastes with the old metering infrastructures and end-of-life of battery waste. However, majority of the risks and impacts likely to be generated from the project activities will be site-specific, temporary, and manageable to an accepted level by applying good construction best practices. This assessment may be revised in the appraisal stage Environmental and Social Review Summary (ESRS), once additional technical details regarding project financed activities are known. … etc. The Bank team will provide support and training on the standards of the new ESF during project preparation and implementation to strengthen the PIU capacity to develop and implement E&S impact and risk management key documents for the project.

Social Risk Rating Substantial

In line with the World Bank ESF guidelines, a substantial social risk rating is proposed for the project. The project activities are anticipated to have a net positive impact on the population by increasing access to energy as well as building the institutional capacities of Comoros's energy sector. Yet the Project scale is expected to be medium and project components are likely to induce some social risks and adverse impacts that are however mostly temporary, predictable and/or reversible. The geographical area of the project is considered as medium due to the limited scope/size of distribution networks to be constructed and additional investments for installation of photovoltaic power plants, extension of electricity transmission network, the maintenance of certain electricity production units as well as the establishment of a new dispatching center (component 1). It is likely that there will be land acquisition and access restrictions for Component 1 (mainly construction of the installation of photovoltaic power plants) leading essentially to economic displacement with disruption to livelihoods and economic activities. The project can be developed without the need for physical displacement. The team will work with the client to avoid or minimize the need for physical displacement in project planning. The proposed project activities may include medium scale civil works. Majority of workers could be recruited locally, even if some interventions may require the engagement of foreign companies / labor given their specialized nature. So the project could induce potential medium labor influx which could lead to GBV/SEA/SH and disturbance of community health and safety mainly risk of transmission of diseases such as STDs and propagation of COVID-19. Other social risks relate to the labor safety issues due to civil works are identified such as the protection of the labor force and failure to comply with the terms of conditions of work (as set in ESS2 and Comoros labor laws) and labor standards of nondiscrimination, child and forced labor, as well as the potential for exploitation and abuse of workers. The extension of the electricity transmission network linked to the Component 1 may lead to traffic and road safety risks during infrastructure construction through increased traffic, movement of machinery and materials etc. The nature and scale of the project, overall social risks and impacts and the limited capacity of the borrower to manage the risks made the social risk rating substantial. This social risk rating will be revisited before appraisal and will continue to be assessed and re-assessed during implementation.

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

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:

ESS1 is relevant to the project. The anticipated significant environmental and social impacts are related to Component 1 which will finance subprojects including construction of installation of photovoltaic power plants,

extension of electricity transmission network, the maintenance of certain electricity production units as well as the establishment of a new dispatching center. During the civil works, feeder roads and quarry sites could be exploited. These activities might cause a series of direct environmental and social risks and will likely generate adverse sites specifics risks and impacts such as loss of vegetation, soil erosion and degradation, soil and surface water pollution, dust and noise emissions, impact on water usage and quality, generation and disposal of construction waste, occupational health and safety concerns to contracted workers, community health and safety risks caused by public nuisance, increased road traffic, propagation of diseases, loss of land and loss or the disruption of income streams and livelihood activities for individuals or groups of people and economic displacement. The selected potential sites are located in very low slope plains, composed of modified habitat without any risk of natural hazard (landslide, flooding). Most of these risks and impacts are expected to be typical for medium scale construction and rehabilitation works, temporary by nature for the majority of works, and site specific. No potential risks related to the deployment of the hardware and software system under the component 2.1 but old metering infrastructures and end-of-life batteries could generate e-waste at this stage of the project. Although the component 3 will finance the strengthening of stakeholders engagement during project preparation and implementation, the TA activities under this component could induce the risk of exclusion of vulnerable groups in stakeholder consultations as well as the decision making process relating to project activities and risk of insufficient coordination with different stakeholders associated with the project, including the different public utilities, private sector, local communities, etc. Based on preliminary information, the sites that could be potentially affected by the subprojects do not include any cultural heritage. The main adverse impacts anticipated during the operation phase are related to the construction of infrastructures which would generate wastewater posing pollution to the environment, risks relate to the safety of workers due to civil works, the protection of the labor force and failure to comply with the labor standards of non-discrimination, child and forced labor, and the potential for exploitation and abuse of workers.

The spread of COVID-19, a result of the project activities, has been identified as another transversal risk for all project components involving face-to-face interactions especially under the component 3 which will consist to many trainings for implementing agencies. The project has been screened using the WB gender-based violence (GBV) risk screening tool for GBV risks and rated as moderate.

During project preparation, the WB will undertake its due diligence on the capacity of the implementing agency capacity, and further assess the relevance of ESSs for the project. All sub-projects will be assessed for their potential environmental and social risks and impacts using an E&S screening tool to be developed as part of the ESIA and subsequent ESMPs proportionate to the risk and nature of the subproject will be required.
This project will benefit from the preparation of the former energy project the Comoros solar energy integration platform (P162783) which has been dropped in June 2021 in which certain locations have been identified and Environmental and Social Impact Assessments (ESIA) and Resettlement Plan (01 ESIA and 01 RP for Grande Comores, 01 ESIA and 01 RP for Anjouan and 01 ESIA and 01 RP for Moheli) have been already prepared two years ago, under the former safeguard policies. To this end, if the same locations are maintained to be financed by the project, these instruments should be updated to meet the requirements of the ESF. However, additional locations will be considered during project preparation to avoid or minimize the need for physical or economic displacement. For the new identified sites the project Environmental and Social Impact Assessment (with site-specific ESMPs) and also potential Resettlement Plan (RP) will be prepared and disclosed if needed. As per ESS1 requirements, each ESIA/ESMP will consider, in an integrated way, all relevant direct, indirect and cumulative environmental and social risks and impacts of the project, including ancillary and associated facilities (if any); (covering also technical assistance

activities for component 3). These documents will include specific requirements of the contractor on Occupational Health and Safety (OHS) and other provisions for the management of their employees, also covering labor influx, and measure to screen for and prevent gender-based violence. Each ESIA will describe the specific subproject, ancillary and associated facilities (if any), its baseline conditions, applicable policies and legislation, and overall key environmental and social considerations and potential impacts. It will also identify and outline detailed management and mitigation measures and implementation arrangements related to all physical activities which will be defined during the Project implementation.; The ESMPs will be reviewed, and receive WB's clearance and disclosure before appraisal. The project will develop draft of standalone Labor Management Procedures (LMP) which contains provisions to ensure that potential labor risks, including child and forced labor, discrimination and sexual harassment, are properly addressed in practice as well as throughout all the project documentation, including ESMPs, bidding documents, and civil works contracts.
The project will also elaborate a Stakeholder Engagement Plan (SEP) and propose a list of training sessions to be included in the capacity-building program which also will be in the project Environmental and Social Commitment Plan (ESCP). The project needs to develop a Grievance mechanism (GM) as part as the SEP, as well as a worker GM as part as the LMP.

In short and according to ESF requirements, the Borrower will develop by appraisal (i) the Environmental and Social Commitment Plan (ESCP) which could be adjusted during the project life keeping with the evolution of environmental and social risk and impact; (ii) a draft stakeholder engagement plan (SEP), including GM; (iii) Labor Management Procedures (LMP); (iv) a draft GBV/SEA action plan (iv) draft Environmental and social Framework (ESMF) with a standalone draft Waste Electrical and Electronic Equipment Management Plan (WEEEMP), (v) draft Resettlement Framework (RF); and no later than two months after effectiveness (vi) Environmental and Social Impact assessment (ESIA) of all expected sites defined during project preparation; (vii) Resettlements Plans (RP) of all expected sites defined during project preparation; All ESIA/ESMPs, and RPs should be consulted with relevant stakeholders, disclosed, and approved by the Bank prior to issuance of corresponding bid packages or initiation of civil works.

Areas where "Use of Borrower Framework" is being considered:

The Borrower's E&S Framework is not being considered for this project, either in whole or in part.

ESS10 Stakeholder Engagement and Information Disclosure

ESS 10 is assessed as relevant to the project at this stage. A Stakeholder Engagement Plan (SEP) will be developed, which will guide the consultation processes and stakeholder engagement throughout the life cycle of the project, starting from preparation down to implementation. The SEP will particularly consider activities related to the component 3.3. Expansion of gender-based communication and awareness campaigns. The SEP will as well aim at engaging project beneficiaries on the installation of meters (subcomponent 2.2). Project beneficiaries will be informed on the the functioning of the meters for prepayment of electricity, and on the possibilities offered by this system to improve management of their energy consumption, increasing transparency in the energy consumption process; and reducing power supply cuts due to delay/non-payment. Stakeholder mapping will be conducted which will identify stakeholders in the different project intervening zones. Potential stakeholders are Ministry of energy, Local government at the respective localities, PAPs inclusive of vulnerable/disadvantaged groups, community leaders, community residents, Civil Society Organizations (CSOs) including Non-governmental organizations (NGOs), private Solar companies, etc. Stakeholder mapping will also analyze the influence of these stakeholders to the project design and implementation and the project's impacts on them. Special attention will be given to inclusion of women,

vulnerable and project affected people, as well as other interested groups. Based on stakeholder mapping, the Borrower will prepare Stakeholder Engagement Plan (SEP) which will include a detailed schedule of planned engagement activities for the various stakeholders during the project cycle and will specify format and frequency of these engagement. The SEP will ensure that all consultation activities will be inclusive and shall fully comply with COVID-19 Protocol of the nation and international best practices while enabling meaningful communication, consultation, and discussion. It will include a Grievance Redress Mechanism which will be implemented to handle complaints from stakeholders and direct/indirect project-affected people regarding adverse temporary or permanent project impacts and risks. Labor Management Plans will also outline a labor GRM for implementation.
The project will prepare and adopt a project-level GRM. The GRM will address all project-related complaints at local, regional, and national levels, including, but not limited to (a) corruption, (b) the non-respect of the rights of direct project beneficiaries, (c) resettlement issues, and (d) GBV and labor issues. As part of the project's Results Framework, the project will track the satisfaction rating from project beneficiaries (administered through a survey questionnaire) as well as the percentage of complaints addressed. The project will carry out annual household surveys to gauge changes in customer satisfaction with energy service delivery.
The draft of SEP will be prepared and disclosed as early as possible but prior to the project appraisal.

B.2. Specific Risks and Impacts

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

ESS2 Labor and Working Conditions

ESS2 is assessed as relevant to the project at this stage. The proposed project will involve direct workers, contracted workers (which will include external companies specialized in conducting strategic studies, civil works contractors and supervising engineers); primary supply workers such as people employed by Borrower's primary suppliers and materials suppliers for construction and rehabilitation (Component 1). In Comoros where migration to overseas to find work is rampant, labor requiremESS2 is assessed as relevant to the project at this stage. The proposed project will involve direct workers, contracted workers (which will include external companies specialized in conducting strategic studies, civil works contractors and supervising engineers); primary supply workers such as people employed by Borrower's primary suppliers and materials suppliers for construction and rehabilitation (Component 1). In Comoros where migration to overseas to find work is rampant, labor requirements are often supplied from outside the project areas, thus labor camps are anticipated. At this stage, it is anticipated that the project will import both few numbers ordinary workers and specialists workers.
Risks identified under ESS2 include (i) OHS induced by civil works under component 1 ; (ii) transmission and contagion of COVID19 during the implementation of all project activities; (iii) risks associated with working conditions and management of worker relationships, which includes terms and conditions of employment, non-discrimination and workers organizations and the protection of the work force, and (iv) impact of labor influx, possibility of child labor and sexual harassment.
The construction of expected infrastructure transmission lines' rehabilitation or civil works related to Component 1 will be subject to the mobilization of external contractors. However, the relatively small scale and footprint of the planned interventions is unlikely to require large mobilizations of workers. Nevertheless, the ESIA of the project should be developed to cover worker mobilization issues and health security and safety measures for workers, which will include the development of code of conduct for workers.

During project preparation, the borrower will prepare a Labor Management Procedures (LMP) in accordance with the requirements of national laws and ESS2, for the project outlining the expected number and type of workers, key gaps between national legislation and regulations that need to be addressed at the project level, as well as monitoring and supervision arrangements. Key aspects of the LMP pertaining to contracted workers, such as Occupational Health and Safety (OHS), adequate working conditions, adequate living conditions in the work camps, employment terms and conditions, non-discrimination and opportunity for workers, a functioning grievance mechanism for workers, will be included in the ESMP. Based on the number of non-local workers expected and on the capacity of the community to absorb this external workforce, the ESIA will assess the risks related to labor influx. To minimize the use of external workforce, local recruitment will be systematically prioritized and capacity building to the local workforce will be planned. If labor influx risks are assessed to be relevant, specific Camp Management Plans will form part of ESMPs to manage and mitigate impacts that may occur during construction. Bidding documents will make explicit reference to these aspects to ensure the commitment of selected contractors to adhere to ESS 2 principles and WB EHS Guidelines. In short, the PIU will develop and implement (i) Labor Management Procedures (LMP); (ii) a worker's Grievance Mechanism (GM); and (iii) sensitization related to the availability of worker's Grievance Mechanism (GM) and to the respect of code of conduct to prevent and address potential harassment, child labor, gender discrimination or GBV/SEA issues, intimidation and/or exploitation during the implements are often supplied from outside the project areas, thus labor camps are anticipated. At this stage, it is anticipated that the project will import both few numbers ordinary workers and specialists workers.

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temporary or full time. The LMP will be prepared, cleared and disclosed in-country and on the Bank's website by appraisal.

Labor Management Procedures (LMPs) will be outlined in the ESIA and a worker specific GRM (for direct and contracted workers) will be established. The ESIA will also outline prohibited categories of workers such as child and forced/bonded labor. To ensure Health and Safety (H&S) of workers during the construction and operational phases of the project, the project will require contractors to prepare and implement their Occupational Health & Safety Plan (OHSP) following the World Bank Group Environment, Health and Safety (EHS) Guidelines (for construction activities) and Industry Sector Guidelines for Construction Materials Extraction. The OHSP will also include procedures on incident investigation and reporting, recording and reporting of non-conformance, emergency preparedness and response procedures and on-going worker training/awareness. A SEA/SH Action Plan will also be in place to mitigate and manage workplace SEA/SH risks.

ESS3 Resource Efficiency and Pollution Prevention and Management

ESS3 is assessed as relevant to the project at this stage. Water consumption is expected primarily in the mixing plants and campsites during the construction phase. As the project activities mainly involve the construction and implementation of PV infrastructures with storage sites and transmission lines will be the generation of waste such as iron and wood, spoils, and used batteries. It is not expected to consume very large amounts of energy and raw materials for these civil works nor use or procure pesticides. However, water resources must be used as efficiently as possible.
Project construction and implementation of PV infrastructures with storage sites and transmission lines will be the generation of waste such as iron and wood, spoils, and used batteries. It is expected that during project implementation, air pollution will be emitted from trucks on-site during construction phase; diesel generators and fugitive dust will also be generated. Also, hazardous and non-hazardous wastes (end-of-life batteries) shall be generated at specific sites. The waste can be solid, liquid, non-hazardous and hazardous, such as hydrocarbon oils from construction machinery and vehicles, end-of-life battery waste. The EISA instruments to be prepared by the Borrower shall include mitigation measures to minimize and manage the noise levels, such as by applying standard restrictions to hours of onsite work. Construction/operation activities shall generate solid wastes . All waste generated by the construction/operation phase shall be disposed at approved sites, in accordance with national laws and regulations, which shall be complemented by ESS3 requirements. The preparation of ESIA instruments shall also provide all additional relevant mitigation measures to be taken during the operation phase. To ensure control the use and release of hazardous materials, and ESS3 requirement, a standalone Waste Electrical and Electronic Equipment Management Plan (WEEEMP) will be prepared to address end-of-life of battery waste and make realistic recommendations, taking into consideration availability of appropriate facilities. The ESIA will include other non hazardous wastes based on the technical study, and propose measures, to the extent technically and financially feasible, that avoid or minimize risks and impacts on communities and the environment, as per this ESSs requirements. The WEEEMP will contain the resources to be deployed, equipment needed, capacity/trainings requirements, and structures to be adopted to ensure inspections etc.

ESS4 Community Health and Safety

ESS4 is assessed as relevant to the project at this stage. During the construction phase, project activities related to the component 1 have the potential to expose communities to health and safety risks especially in those communities that are situated immediately close to the construction of photovoltaic power plants. Communities also could be affected by the potential labor influx which may give rise to communicable diseases such as the Covid-19 and risk of SEA/SH. The Borrower will assess SEA/GBV risks through the preparation of a SEA/GBV Risk Assessment and will prepare a SEA/GBV Action Plan accordingly. Additional activities to be included in GBV action plan are specific actions (training, public awareness, etc.) to avoid sexual harassment and exploitation. The ESIA will conduct a Risk Hazard Assessment (RHA) for the activities that have the potential to generate emergency event (fire at batteries disposal sites, hazardous spills etc.). Based on the results of the RHA, the Borrower shall prepare an Emergency Response Plan (ERP) in coordination with the relevant local authorities and the affected communities.
The E&S procedures in the ESMP will identify all project related risks and impacts and propose mitigation measures and appropriate management plans for managing such risks and impacts that will provide more site-specific and detailed mitigation measures (including infrastructure and equipment design/safety, emergency preparedness, and security measures), monitoring indicators, budget and roles and responsibilities.
However transportation of dredged materials and vehicle traffics during the civil works will expose communities to health and safety risks from increased traffic during construction. Community access will also be affected. Traffic management plans will be developed and implemented to address these inconveniences and a community outreach strategy will help inform local communities about changes in access. For all the construction work, site-specific ESMPs will require contractors to install a safety system around the project sites (fences and safety guards) during the entire construction period. When works take place on open roads, equipment and vehicles will be brought together to one single well-secured area during the night to ensure both community and worker's safety. A Community Health & Safety Plan will be required from contractors, which will also include procedures on incident investigation and reporting, recording and reporting of non-conformance, emergency preparedness and response procedures and community awareness raising activities.
Potential sites for the installation of photovoltaic power plants, the extension of the electricity transmission network, the maintenance of certain electricity generation units are modified habitats. An assessment of the valuation of the sites and the existing ecosystem services by the local community will be carried out in the ESIA.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

ESS5 is relevant to the project at this stage. Project activities planned under Component 1. The construction of the PV generation, and battery storage sites across the three islands; network rehabilitation; modernization and automation (including installation of automatic reset devices, circuit breakers, and remote-controlled switches); and reinforcement of transmission lines and transformers may result in the need for limited land acquisitions leading essentially to economic displacement with disruption to livelihoods and economic activities with a moderate risk of physical displacement.
This project will benefit from the preparation of the former energy project, the Comoros solar energy integration platform (P162783) which has been dropped in June 2021 in which certain locations have been identified and 03 Resettlement Plans (01 RP for Grande Comore, 01 RP for Anjouan and 01 RP for Moheli) have been already prepared two years ago, under the former safeguard policies. To this end, if the same locations are maintained to be financed by the project, these 3 instruments will be updated, re-consulted and disclosed prior to Board Approval to meet the requirements of the ESF by the borrower in accordance with the requirements of ESS5 and national land expropriation laws, to provide principles and guide the implementation of mitigation measures for impacts of land

acquisitions. The team will work with the client to avoid or minimize the need for physical displacement in project planning. However as the exact location of each infrastructures require resettlement, are not well known at this stage, therefore to avoid, minimize and to manage any resettlement and land acquisition issues, and in compliance with ESS5 (and EES10 for consultation and mobilization) the project will develop, consult upon, and disclose a draft Resettlement Framework (RF) prior to appraisal. Subsequent Resettlement Plans (RP) will be required for all subprojects that will induce such impacts. Resettlement Plans (RP) will be developed, consulted and disclosed consistent with the same general principles and procedures established in the RF. The project will follow the mitigation hierarchy, i.e. avoid, minimize, mitigate and/or compensate potential impacts from the design to the implementation.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

ESS6 is assessed as relevant to the project at this stage. The potential sites identified during the project preparation, on Grande Comores, on Anjouan, and on Moheli Most of the cities concerned by the selected sites of the project are known to be surrounded by low diversity of ecosystems: degraded forests, savanna and brunches. The ESMF/ESIAs will make sure that civil works do not impact legally protected areas or areas of high biodiversity values. Further impacts on biodiversity or modified habitats will be assessed during the preparation of the site-specific ESIAs, including risks for fauna during operation. ESIA will conduct analyses of alternatives to avoid and minimize impacts on natural habitats and other environmental, social and cultural receptors, minimizing land acquisition as well as impacts on livelihoods on potential sites.

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

ESS7 is not relevant for the project. There are no Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities that meet the criteria of IP/SSHAUTLCs, per the requirements of this Standard, in the project area.

ESS8 Cultural Heritage

ESS8 is assessed as relevant to the project at this stage. Based on preliminary information, the sites that could be potentially affected by the projects do not include any cultural heritage. However as a due diligence complete inventory of cultural heritage at the different project sites will be conducted as part of the ESIAs and the mitigation hierarchy will be applied on the management of the project's potential risks and impacts. “Chance Find Procedures” will be included in the ESMP and a chance find clause will be included in works contracts requiring contractors to stop construction if cultural heritage is encountered during construction and to notify and closely coordinate with the relevant mandated Government authority for the salvaging and restoration of such cultural heritage.

ESS9 Financial Intermediaries

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

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways	No
OP 7.60 Projects in Disputed Areas	No

III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE

A. Is a common approach being considered? No

Financing Partners

Not relevant

B. Proposed Measures, Actions and Timing (Borrower's commitments)

Actions to be completed prior to Bank Board Approval:

Actions to be completed prior to Appraisal:
- Preparation, consultation and disclosure of the Environmental and Social Commitment Plan (ESCP);
- Preparation, consultation and disclosure of draft stakeholder engagement plan (SEP), including GM;
- Preparation, consultation and disclosure of draft Labor Management Procedures (LMP);
- Preparation, consultation and disclosure of a draft GBV/SEA action plan;
- Preparation, consultation and disclosure of Waste Electrical and Electronic Equipment Management Plan (WEEEMP)
- Preparation, consultation and disclosure of the Environmental and Social Management Framework (ESMF)
- Preparation, consultation and disclosure of the Resettlement Framework (RF)
- Preparation, consultation and disclosure of the Environmental and Social Impact Assessment (ESIA) with EMSP for the three PV, storage sites and transmission line for first year of implementation
- Preparation, consultation and disclosure of the Resettlement Plan (RP) for the three PV, storage sites and transmission line for first year of implementation.

Possible issues to be addressed in the Borrower Environmental and Social Commitment Plan (ESCP):

Possible issues to be addressed in the Borrower Environmental and Social Commitment Plan (ESCP):
- Implementation of Capacity enhancement plan as strengthening measures to enhance E&S performance of the project
- Update and implementation of Environmental and Social Impact Assessment (ESIAs) including a cumulative impact assessment and Resettlement Plans for all locations defined during preparation;
- Update and implementation of Labor Management Procedures (LMP)
- Update and implementation of Stakeholder Engagement Plan (SEP)
- Update and implementation of Project Grievance Mechanism (GM)
- Update and implementation of GBV action plan
- Inclusion of Code of conduct within all of project workers' contract to prevent sexual abuse or harassment.

Actions to be completed prior no later than two months after effectiveness:

- Preparation, consultation and disclosure of the Environmental and Social Impact Assessment (ESIA) with EMSP for the three PV, storage sites and transmission line for first year of implementation
- Preparation, consultation and disclosure of the Resettlement Plan (RP) for the three PV, storage sites and transmission line for first year of implementation.

C. Timing

Tentative target date for preparing the Appraisal Stage ESRS 04-Apr-2022

IV. CONTACT POINTS

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Borrower/Client/Recipient

Borrower: Government of Union of Comoros

Implementing Agency(ies)

Implementing Agency: Ministry of Energy, Water and Hydrocarbons

V. FOR MORE INFORMATION CONTACT

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VI. APPROVAL

Task Team Leader(s):	Justin Marie Bienvenu Beleoken Sanguen
Practice Manager (ENR/Social)	David Seth Warren Recommended on 26-Jan-2022 at 12:04:15 GMT-05:00
Safeguards Advisor ESSA	Peter Leonard (SAESSA) Cleared on 27-Jan-2022 at 09:34:27 GMT-05:00