



**Union of Comoros/Ministry of Land Use and
Urban Planning, responsible for Land Affairs and
Land Transport**

**Comoros Post-Kenneth Recovery and Resilience
Project (P171361)**

**ENVIRONMENTAL and SOCIAL
COMMITMENT PLAN (ESCP)**

24 October 2019

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Union of Comoros will implement the Comoros Post-Kenneth Recovery and Resilience Project (the **Project**), with the involvement of the following Ministry: Ministry of Territorial Land Use and Urban Planning, responsible of Land Affairs and Land Transport (hereinafter the **Ministry**). The International Development Association (hereinafter the **Association**) has agreed to provide financing for the Project.
2. The Union of Comoros will implement material measures and actions so that the Project is implemented in accordance with the Environmental and Social Standards (**ESSs**). This Environmental and Social Commitment Plan (**ESCP**) sets out material measures and actions, any specific documents or plans, as well as the timing for each of these.
3. The Union of Comoros will also comply with the provisions of any other Environmental and Social (E&S) documents required under the Environmental and Social Framework (ESF) and referred to in this ESCP, such as but not limited to, the Environmental and Social Framework (ESMF), Resettlement Framework (RF), Environmental and Social Management Plans (ESMP), Resettlement Plans (RP), Labor Management Procedures (LMP) and Stakeholder Engagement Plans (SEP), and the timelines specified in those E&S documents.
4. The Union of Comoros is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the Ministry, agency or unit referenced in 1. above.
5. Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the Association by the Union of Comoros as required by the ESCP and the conditions of the legal agreement, and the Association will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
6. As agreed by the Association and the Union of Comoros, this ESCP may be revised from time to time during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to assessment of Project performance conducted under the ESCP itself. In such circumstances, the Union of Comoros will agree to the changes with the Association and will update the ESCP to reflect such changes. Agreement on changes to the ESCP will be documented through the exchange of letters signed between the Association and the Union of Comoros. The Union of Comoros will promptly disclose the updated ESCP.
7. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, the Union of Comoros shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts.

| Comoros Post-Kenneth Recovery and Resilience Project (P171361) Environmental and Social Commitment Plan October, 2019 | | | |
|---|--|---|---|
| Summary of the Material Measures and Actions to Mitigate the Project’s Potential Environmental and Social Risks and Impacts | | Timeframe | Responsibility/Authority and Resources/Funding Committed |
| ESCP MONITORING AND REPORTING | | | |
| A | REGULAR REPORTING: Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of environmental and social (E&S) documents required under the ESCP, stakeholder engagement activities, functioning of the grievance mechanism(s), ESMF/ESMP and RAP Implementation. | <i>Quarterly reporting throughout Project implementation to the World Bank.</i> <i>Service Providers report to the PIU on a monthly basis.</i> | <i>Responsibility: PIU Environment & Social Team</i> <i>Accountability: PIU Coordinator</i> <i>Funding: Project Funds</i> |
| B | INCIDENTS AND ACCIDENTS: Promptly notify the Association of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers including without limitation any allegations of gender-based violence, Project-related occupational accidents or fatalities, or labor strikes and social unrest. Provide sufficient detail regarding the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and supervising entity, as appropriate. Subsequently, as per the Association’s request, prepare a report on the incident or accident and propose any measures to prevent its recurrence. | <i>Notify the Bank within 48 hours after learning of the incident or accident in line with the World Bank Environment and Social Incidence Response Toolkit (ESIRT).</i> <i>An incident report would be provided within a timeframe acceptable to the Association, as requested.</i> | <i>Responsibility: PIU Environment & Social Team</i> <i>Accountability: PIU Coordinator</i> <i>Funding: Project Funds</i> |
| C | CONTRACTORS MONTHLY REPORTS: Contractor monthly reports would be submitted to the Association by the Borrower upon request. | <i>Contractor monthly reports submitted to the Association upon request.</i> | <i>Responsibility: PIU Environment & Social Team</i> <i>Accountability: PIU Coordinator</i> <i>Funding: Project Funds</i> |
| D | THIRD PARTY MONITORING: An Independent Verification Agent (IVA) will be engaged to provide independent review of environmental and social performance of the sub-projects, including adherence to all aspects of the Project Operations Manual. | <i>Six (6) months after start of Project sub-projects and thereafter on a bi-annual basis until project completion</i> | <i>Responsibility: PIU Environment & Social Team</i> <i>Accountability: PIU Coordinator</i> <i>Funding: Project Funds</i> |
| Summary Assessment | | | |
| ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS | | | |

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| 1.1 | <p>ORGANIZATIONAL STRUCTURE: Establish and maintain an organizational structure with qualified staff (1 environmental and 1 social specialist) and resources to support management of E&S risks.</p> <p>Mobilize additional staff needed on short-term or long-term assignment in accordance with ESMF institutional assessment/needs, including subject matter specialists on gender-based violence and sexual exploitation and abuse (GBV/SEA), labor conditions (health & safety), and social inclusion.</p> | <p><i>An organizational structure including the two (2) additional specialist (environment and social) will be established within 30 days after Project effectiveness. The organizational structure, including the specialists, should be maintained throughout Project implementation.</i></p> | <p><i>Responsibility: PIU Environment & Social Team</i> <i>Accountability: PIU Coordinator</i> <i>Funding: Project Funds</i></p> |
| 1.2 | <p>HABITAT COMMITTEES: Establish Habitat Committees comprising of female representatives of the local women's groups to ensure women are meaningfully represented in the consultation and land titling processes.</p> | <p><i>60 – 120 days after Project effectiveness and implemented throughout project implementation.</i></p> | <p><i>Responsibility: MATU</i> <i>Accountability: PIU</i> <i>Funding: Project Funds</i></p> |
| 1.3 | <p>ENVIRONMENTAL AND SOCIAL ASSESSMENT: Finalize, adopt, and implement, the Environmental and Social Management Framework (ESMF) and Resettlement Framework (RF) that has been prepared for the Project, in a manner acceptable to the Association.</p> | <p><i>Finalize, adopt and disclose the ESMF and RF four (4) weeks after project effectiveness</i></p> <p><i>Implemented throughout project implementation</i></p> | <p><i>Responsibility: PIU Environment & Social Team</i> <i>Accountability: PIU Coordinator</i> <i>Funding: Project Funds</i></p> |
| 1.4 | <p>MANAGEMENT TOOLS AND INSTRUMENTS: Screen any proposed subproject in accordance with the Environmental and Social Management Framework (ESMF) prepared for the Project, and, thereafter, draft, adopt, consult, disclose and implement the sub-project instruments in accordance with the ESMF and in a manner acceptable to the Association.</p> | <p><i>ESIAs/ESMPs submitted for the Association approval before launching the bidding process for the respective subproject.</i></p> <p><i>Once approved, the ESIAs/ESMPs are carried out throughout Project implementation.</i></p> | <p><i>Responsibility: PIU Environment & Social Team</i> <i>Accountability: PIU Coordinator</i> <i>Funding: Project Funds</i></p> |

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| 1.5 | <p>MANAGEMENT OF CONTRACTORS: Incorporate the relevant aspects of the ESCP, including the relevant E&S documents and/or plans, and the Labor Management Procedures, into the ESHS specifications of the procurement documents with contractors.</p> <p>Ensure contractors develop, consult and adopt a contractor ESMPs in a manner acceptable to the Association.</p> <p>Thereafter ensure that the contractors comply with the ESHS specifications of their respective contracts.</p> | <p><i>Prior to the preparation of procurement documents.</i></p> <p><i>Prior to commencement of civil works.</i></p> <p><i>Supervise contractors throughout Project implementation.</i></p> | <p><i>Responsibility: PIU Environment & Social Team</i></p> <p><i>Accountability: PIU Coordinator</i></p> <p><i>Funding: Project Funds</i></p> |
| 1.6 | <p>PERMITS, CONSENTS AND AUTHORIZATIONS: Obtain or assist in obtaining, as appropriate, the permits, consents and authorizations that are applicable to the Project from relevant national authorities.</p> <p>Comply or cause to comply, as appropriate, with the conditions established in these permits, consents and authorizations throughout Project implementation.</p> <p>Obtain Environmental Compliance Certificate from the Ministry of Environment in line with the Union of Comoros Environmental Framework Law on the Environment</p> | <p><i>Prior to initiating activities that require permits, consents and authorizations.</i></p> <p><i>Prior to procurement of contractors.</i></p> | <p><i>Responsibility: PIU Environment & Social Team</i></p> <p><i>Accountability: PIU Coordinator</i></p> <p><i>Funding: Project Funds</i></p> |
| 1.7 | <p>CONTINGENT EMERGENCY RESPONSE: In the event of an emergency which leads to activation of the Contingent Emergency Response (Part 4) of the Project, the necessary instruments and measures will be developed as required prior to undertaking of the emergency response activities, to ensure compliance with ESSs.</p> | <p><i>Prior to the start of emergency response activities. The request to activate this part shall come from the implementer with prior No Objection from the Association.</i></p> | <p><i>Responsibility: PIU Environment & Social Team</i></p> <p><i>Accountability: PIU Coordinator</i></p> <p><i>Funding: Project Funds</i></p> |
| ESS 2: LABOR AND WORKING CONDITIONS | | | |
| 2.1 | <p>LABOR MANAGEMENT PROCEDURES: Finalize, adopt, and implement the Labor Management Procedures (LMP) that have been developed for the Project.</p> <p>Codes of Conduct will be required for all contractors and subcontractors and their workers.</p> | <p><i>Four (4) weeks after project effectiveness and maintained throughout Project implementation.</i></p> <p><i>Prior to engaging Project workers and maintained throughout Project implementation.</i></p> | <p><i>Responsibility: PIU Environment & Social Team</i></p> <p><i>Accountability: PIU Coordinator</i></p> <p><i>Funding: Project Funds</i></p> |

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| 2.2 | GRIEVANCE MECHANISM FOR PROJECT WORKERS: Establish, maintain, and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2. | <i>Grievance mechanism operational prior to engaging Project workers and maintained throughout Project implementation.</i> | Responsibility: PIU Environment & Social Team Accountability: PIU Coordinator Funding: Project Funds |
| 2.3 | OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES: Prepare, adopt, and implement occupational, health and safety (OHS) measures specified in the ESMP. | <i>Same timeframe as for the implementation of the ESMPs. Maintained throughout Project implementation.</i> | Responsibility: PIU Environment & Social Team Accountability: PIU Coordinator Funding: Project Funds |
| 2.4. | EMERGENCY PREPAREDNESS AND RESPONSE: As part of the OHS measures specified in 2.3, include measures on Emergency Preparedness and Response. Ensure workers and contractors are trained and implement the plan. | <i>Same timeframe as for the implementation of the ESMPs. Maintained throughout Project implementation.</i> | Responsibility: PIU Environment & Social Team Accountability: PIU Coordinator Funding: Project Funds |
| ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT | | | |
| 3.1 | MANAGEMENT OF WASTE AND HAZARDOUS MATERIALS: As part of the ESMP, develop and implement measures and procedures for managing waste and hazardous materials during demolition, construction and disposal and other relevant pollution prevention and control measures. | <i>Same timeframe as for the ESMP. Maintained throughout Project implementation</i> | Responsibility: PIU Environment & Social Team Accountability: PIU Coordinator Funding: Project Funds |
| ESS 4: COMMUNITY HEALTH AND SAFETY | | | |
| 4.1 | TRAFFIC AND ROAD SAFETY: Adopt and implement measures and actions to assess and manage traffic and road safety risks as required in the ESMPs to be developed under action 1.3 above. | <i>Same timeframe as for the preparation and implementation of the ESMPs. Maintained throughout Project implementation</i> | Responsibility: PIU Environment & Social Team Accountability: PIU Coordinator Funding: Project Funds |
| 4.2 | COMMUNITY HEALTH AND SAFETY: Prepare, adopt, and implement measures to assess and manage specific risks and impacts to the community arising from Project activities, including behavior of Project workers and risks of labor influx, as part of the ESMPs, in a manner acceptable to the Association. | <i>Same timeframe as for the preparation and implementation of the ESMPs. Maintained throughout Project implementation.</i> | Responsibility: PIU Environment & Social Team Accountability: PIU Coordinator Funding: Project Funds |

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| 4.3 | GBV AND SEA RISKS: Prepare, adopt, and implement a stand-alone Gender-Based Violence Action Plan (GBV Action Plan) to assess and manage the risks of gender-based violence (GBV) and sexual exploitation and abuse (SEA). | <i>Submit the GBV Action Plan for the Association's approval before the launching of the bidding process. Once approved, the GBV Action Plan is implemented throughout Project implementation.</i> | <i>Responsibility: PIU Environment & Social Team Accountability: PIU Coordinator Funding: Project Funds</i> |
| 4.4 | GBV AND SEA RISKS DURING PROJECT IMPLEMENTATION: There will be GBV procedures in place, including training and monitoring, before and during project implementation. This will be defined in the ESMF and through a GBV action plan. | <i>Prior to initiating construction and maintained throughout Project implementation.</i> | <i>Responsibility: PIU Environment & Social Team Accountability: PIU Coordinator Funding: Project Funds</i> |
| 4.4 | SECURITY PERSONNEL: Prepare, adopt, and implement a stand-alone Security Personnel Management Plan consistent with the requirements of ESS4, in a manner acceptable to the Association | <i>Prior to engaging security personnel and thereafter implemented throughout Project implementation.</i> | <i>Responsibility: PIU Environment & Social Team Accountability: PIU Coordinator Funding: Project Funds</i> |
| 4.5 | TRAINING FOR THE COMMUNITY: Conduct trainings for the communities designed to heighten awareness of environmental and social risks and impacts and mitigation measures including trainings on (not exhaustive): <ul style="list-style-type: none"> - Communicable diseases/HIV-AIDS/STD awareness and prevention - GBV/SEA and Child Protection awareness - Grievance mechanism as described in the SEP/ ESMF - Road Safety Awareness | <i>Prior to initiating construction, with regular refresher training and maintained throughout Project implementation.</i> | <i>Responsibility: PIU Environment & Social Team Accountability: PIU Coordinator Funding: Project Funds</i> |
| ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT | | | |
| 5.1 | RESETTLEMENT FRAMEWORK: Consult, finalize, adopt, and implement, the Resettlement Framework (RF) that has been prepared for the Project, in a manner acceptable to the Association. | <i>Finalize, adopt and disclose the RF four (4) weeks after project effectiveness Implemented throughout project implementation</i> | <i>Responsibility: PIU Environment & Social Team Accountability: PIU Coordinator Funding: Project Funds</i> |
| 5.2 | RESETTLEMENT PLANS: Prepare, consult, adopt, and implement resettlement plans (RPs) in accordance with ESS5 and consistent with the requirements of the Resettlement Framework (RF) that will be prepared for the Project, and thereafter adopt and implement the respective RPs before carrying out the associated activities, in a manner acceptable to the Association. | <i>RPs submitted for the Association approval before launching the bidding process for the respective subproject and implemented prior to commencing Project activities that involve land acquisition and resettlement.</i> | <i>Responsibility: PIU Environment & Social Team Accountability: PIU Coordinator Funding: Project Funds</i> |

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| 5.3 | <p>RESETTLEMENT MONITORING: Prepare and submit to the Association regular monitoring reports on RAP Implementation.</p> <p>Engage an independent resettlement consultant/consultancy firm to undertake a Resettlement Completion Audit Report for each RP and address any gaps identified to the satisfaction of the Association.</p> | <p><i>Quarterly reporting throughout Project implementation to the World Bank.</i></p> <p><i>No later than six (6) months after RP implementation completion and submission for approval by the Association</i></p> | <p><i>Responsibility: PIU Environment & Social Team</i> <i>Accountability: PIU Coordinator</i></p> <p><i>Funding: Project Funds</i></p> |
| ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES | | | |
| 6.1 | <p>BIODIVERSITY RISKS AND IMPACTS: The sub-project instruments will assess and propose measures to manage risks and impacts to natural habitats consistent with the requirements of this ESS and in a manner acceptable to the Association.</p> | <p><i>Submit for the Association’s prior approval prior to construction of coastal protection infrastructure that may affect biodiversity.</i></p> <p><i>Once approved the plan is implemented throughout Project implementation.</i></p> | <p><i>Responsibility: PIU Environment & Social Team</i> <i>Accountability: PIU Coordinator</i> <i>Funding: Project Funds</i></p> |
| ESS 8: CULTURAL HERITAGE | | | |
| 8.1 | <p>CHANCE FINDS: Prepare, adopt, and implement the chance finds procedure described in the ESMF/ESMP developed for the Project.</p> | <p><i>Same timeframe as for the ESMPs and maintained throughout Project implementation.</i></p> | <p><i>Responsibility: PIU Environment & Social Team</i> <i>Accountability: PIU Coordinator</i> <i>Funding: Project Funds</i></p> |
| ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE | | | |
| 10.1 | <p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION: Prepare a draft Stakeholder Engagement Plan (SEP). Update, adopt, and implement Stakeholder Engagement Plan (SEP) and ensure SEP is incorporated into the project’s management system, adequate staffing and budget is allocated to implementing the SEP.</p> | <p><i>Draft to be submitted prior to appraisal and updated, adopted and implemented four (4) weeks after project effectiveness.</i></p> | <p><i>Responsibility: PIU Environment & Social Team</i> <i>Accountability: PIU Coordinator</i> <i>Funding: Project Funds</i></p> |
| 10.2 | <p>PROJECT GRIEVANCE MECHANISM: Prepare a draft GM as part of the draft SEP.</p> <p>Adopt, update, maintain and operate a GM, as described in the SEP.</p> | <p><i>Draft to be submitted prior to project appraisal.</i></p> <p><i>Final GM submitted four (4) weeks after project effectiveness and updated regularly throughout project implementation.</i></p> | <p><i>Responsibility: PIU Environment & Social Team</i> <i>Accountability: PIU Coordinator</i> <i>Funding: Project Funds</i></p> |
| CAPACITY SUPPORT (TRAINING) | | | |

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| CS1 | <p>All capacity building activities and trainings will be further detailed in the ESMF. Trainings may be required in:</p> <ul style="list-style-type: none"> • Stakeholder engagement • Subprojects Environmental and Social screening • Occupational and Community Health and Safety • Emergency preparedness and response • Gender-Based Violence Risk Mitigation • Disability inclusion training • Grievance Management • Implementation, Monitoring and reporting of ESMPs, Labor management procedures, resettlement, etc. | <p><i>Prior to commencement of project activities and/or civil works and throughout project implementation.</i></p> | <p><i>Responsibility: PIU Environment & Social Team Accountability: PIU Coordinator Funding: Project Funds</i></p> |
| CS2 | <p>Implement training of Project workers designed to improve awareness of risks and to mitigate impacts on local communities, as defined in ESMF, LMP and GBV action plan.</p> | <p><i>Prior to commencement of project civil works and throughout project implementation.</i></p> | <p><i>Responsibility: PIU Environment & Social Team Accountability: PIU Coordinator Funding: Project Funds</i></p> |