



# Appraisal Environmental and Social Review Summary

## Appraisal Stage

### **(ESRS Appraisal Stage)**

Date Prepared/Updated: 02/06/2024 | Report No: ESRSA03244



I. BASIC INFORMATION

A. Basic Operation Data

Operation ID	Product	Operation Acronym	Approval Fiscal Year
P179109	Investment Project Financing (IPF)	KM Interisland Connectivity Project SOP2	2024
Operation Name	Comoros Interisland Connectivity Project SOP2		
Country/Region Code	Beneficiary country/countries (borrower, recipient)	Region	Practice Area (Lead)
Comoros	Comoros	EASTERN AND SOUTHERN AFRICA	Transport
Borrower(s)	Implementing Agency(ies)	Estimated Appraisal Date	Estimated Board Date
The Union of Comoros	Ministry of Maritime and Air Transport	25-Jan-2024	21-Mar-2024
Estimated Decision Review Date	Total Project Cost		
18-Jan-2023	48,000,000.00		

Proposed Development Objective

The Project Development Objective (PDO) is to improve maritime transport resilience, connectivity and safety between the islands.

B. Is the operation 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 Activities

[Description imported from the PAD Data Sheet in the Portal providing information about the key aspects and components/sub-components of the project]

For small island states such as Comoros, transport infrastructure is of vital importance not only to be connected to the rest of the world, but also to enhance socioeconomic integration within the country. All three primary ports in Comoros have capacity constraints. Because of inefficient port operations and unreliable and unsafe transport services, the



interisland connectivity has been declining in recent years, leaving the Comorian economy fragmented and causing chronic shortage of food and other consumer products in the islands, particularly Moheli, the poorest island of the archipelago. The country's climate vulnerability adds to sustainability and resilience challenges in the maritime transport sector. Port Boingoma in Moheli Island was damaged by Cyclone Kenneth in April 2019 and further degraded by Cyclone Cheneso in January 2023. Maritime transport safety is also of particular concern in Comoros. Because of unreliable ferry services, many local people use "informal" interisland transport services by small fishing boats, called kwassa kwassa. It is estimated that over 100,000 passengers are estimated to cross the Indian Ocean that way every year, causing significant casualties. Given limited available resources, the proposed operations take a programmatic approach. The SOP1 was approved in May 2022, primarily focused on building the climate resilience of Port Boingoma through carrying out the design and construction of a breakwater. The AF was also approved in May 2023. Building upon the SOP1, the proposed project (SOP2) aims at improving maritime transport connectivity and safety between the islands, by supporting: (i) the expansion of the port capacity at Port Boingoma, including quays, superstructure and access roads, (ii) the development of minor infrastructure at selected priority landing sites (i.e., secondary ports) at Ouroveni in Grande Comore and Vassy in Anjouan, to assure safe passenger operations, and (iii) a pilot new passenger boat program where new, safe boats properly designed for passenger transport with a capacity of about 20-30 passengers will be purchased and operated among the secondary ports to be developed. The SOP2 will also support project implementation and capacity building to: improve maritime safety regulations, support local community activities where local people are affected by the project, for example, through supporting the national fishery and maritime education systems, and implement measures to increase women's voice for safety and personal security in the maritime transport sector.

## D. Environmental and Social Overview

### D.1 Overview of Environmental and Social Project Settings

*[Description of key features relevant to the operation's environmental and social risks and opportunities (e.g., whether the project is nationwide or regional in scope, urban/rural, in an FCV context, presence of Indigenous Peoples or other minorities, involves associated facilities, high-biodiversity settings, etc.) – Max. character limit 10,000]*

The Comoros is an archipelago of three major islands composed by volcanic islands, Grande Comore, Moheli and Anjouan, located off the coast of Mozambique in the Indian Ocean. The proposed project aims to improve maritime transport connectivity and safety between the islands. The project will be implemented in all the three islands in Comoros – Boingoma Port (Fomboni area) on Moheli island and secondary ports Ouroveni in Grande Comore, and Vassy in Anjouan. These selected sites are in coastal zones with some sensitive ecosystems (coral reefs, spawning areas). Ouroveni and Vassi secondary port sites are composed of flat configuration. During the periods of new and full moon, differences of 3 to 4.9 m are recorded between high and low tides. Between the different islands, despite the presence of coral reefs, the bottom structure varies rapidly from 0 to 100m with favorable conditions for the navigation of boats of different sizes. The intact natural forest, humid evergreen occupies the heights of the reliefs. These forests, rich in endemic forms and varied habitats, are regressing under the action of agricultural activities. Mangroves or modified vegetation border the coastline. The fringing reefs dominate the beaches. Strong pressure on natural environments leads to a decrease in resources, degradation of ecosystems and the disappearance of certain species.

The Comoros has a population of about 830,000 with an estimated 40 percent of Comorians living below the national poverty line in 2014. Moheli is the most lagging-behind region in the country. While poverty incidence in Moroni and other parts of Grande Comores are relatively low at 30.7 percent and 32.7 percent, respectively, Moheli has the highest rate of 53.2 percent. Poverty in Anjouan is 38.2 percent. Society is matrilineal, and women have access to property



according to custom and law. However, women do not always have the right to use their property rights. The traditional system tends to exclude women from formal decision-making processes. Men hold the heads of villages positions. About 38 percent of the working-age adults have their main job in agriculture and 29 percent are employed in the service sector, while employment in industry or manufacturing and trade is relatively low. Less-educated workers are generally concentrated in agricultural employment, and to a lesser extent trade, while those with superior education are engaged in the service sector. The participation in the labor market and the nature of employment is characterized by some gender discrepancies. Only one-third of women are part of the workforce, compared to a participation rate of 57 percent for men. Fishing is mainly artisanal, and many fishers still use traditional wooden canoes. However, small motorized fiberglass boats have been introduced into artisanal fishing. While Grande Comores and Anjouan are relatively well connected by formal ferries and large freight vessels, Moheli, the poorest island, is most isolated. Local travelers mainly use small “informal” flat-bottomed fishing boats converted with plank seating to carry passengers among beaches (“secondary ports”) to meet the daily transport needs as available formal maritime transport services are limited. These boats are referred to by some Comorians as “kwassa kwassa,” a pejorative term originating with similar boats illicitly carrying people and cargo between Comoros and the nearby French territory of Mayotte. But the small informal passenger boat operators who only carry passengers between the three Comorian islands prefer the term “COMA 4” (a common boat model) when referring to their boats and passenger transport activities. Local people rely on these efficient but unsafe small boats for their daily transportation between the islands. For safety reasons, the Government has prohibited passenger operations by these so-called kwassa kwassa. However, the policy is not strongly enforced because there is no alternative transport means to meet the time-elastic needs for local communities, and some local and national coastal government offices earn revenues from per-passenger fees charged to the operators. It is estimated that as many as 136,000 passengers cross the Indian Ocean per year by these COMA 4 boats. The safety records received from the National Agency of Maritime Affairs (ANAM) show that on average 4-7 incidents involving the small informal boats were recorded annually.

## **D.2 Overview of Borrower’s Institutional Capacity for Managing Environmental and Social Risks and Impacts**

*[Description of Borrower’s capacity (i.e., prior performance under the Safeguard Policies or ESF, experience applying E&S policies of IFIs, Environmental and social unit/staff already in place) and willingness to manage risks and impacts and of provisions planned or required to have capabilities in place, along with the needs for enhanced support to the Borrower – Max. character limit 10,000]*

The project’s Project Implementation Unit (PIU), created under the Ministry of Maritime and Air Transport (Ministère des Transports Maritime et Aérien, Chargé du Tourisme et de l’Artisanat, or MMAT) recruited an E&S team composed of a Social Specialist, an Environmental Specialist and an SEA/SH and Gender Specialist to oversee the implementation of E&S risk management aspects under SOP 1 and SOP 2. The Social and Environmental Specialists in the PIU team received their first ESF training session in 2022, conducted by the WB team, who also provide ongoing capacity building and support to the E&S PIU staff on relevant issues. The PIU is responsible for implementing all maritime transport policies in Comoros, including port regulations and PPP supervision. Under SOP1, a capacity building assessment was conducted for the PIU and all port sector stakeholders to ensure the implementation of environmental and social measures and the monitoring of the activities themselves. E&S Training was provided for the PIU in 2012 and 2013 and will continue in 2014 and beyond. As recommended under the ESIA for Boingoma Port and ESMF for the secondary Ports, Ministry of Transport will implement an Environmental and Social Management System (ESMS) for operation of the Boingoma Port by the Boingoma Port Authority, which includes measures for managing risks and impacts related to the operational phase. Further technical support requirements have also been identified for the operational phase. The



ESMF for the Secondary Ports and ESIA for Boingoma Port identified relevant E&S capacity building described in the ESCP for enabling implementation by the project in a manner to meet Bank ESF standards. The PIU will cooperate closely with the SCP (Société Comorienne des Ports) for ports technical operation, the ANAM (Association Nationale des Affaires Maritimes) as the public organizations in charge of administrative actions related to hydrographic activities and other key actors involved in project preparation and implementation such as the Ministry of Environment, and the National Network of Protected Areas (Réseau National des Aires Protégées, or RENAP in French). These entities are not yet familiar with the WB's operations or with the ESF.

## II. SUMMARY OF ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

### A. Environmental and Social Risk Classification (ESRC)

High

#### A.1 Environmental Risk Rating

High

*[Summary of key factors contributing to risk rating, in accordance with the ES Directive and the Technical Note on Screening and Risk Classification under the ESF – Max. character limit 4,000]*

The environment risk is assessed as High, related to activities to enhance the capacity of Port Boingoma and installation of infrastructure at selected secondary ports. The infrastructure improvements in the Boingoma Port will likely involve heavy civil works, with noise, vibration, dust, traffic, and possible community safety concerns. Potential impacts to biodiversity may arise because the port site is within the boundary of the protected area of Moheli. For infrastructure building and port improvements, an ESIA for Boingoma Port and an ESMF for the secondary port was approved and disclosed in the country and on the WB external website on January 20, 2022. The Domoni quarry site activities, which are considered Substantial risk, could generate occupational and community health & safety issues and potential increase in road or traffic-related accidents, especially during construction and transportation with additional noise, vibration, dust, traffic, and possible community safety concerns. A supplementary ESIA with its ESMP for the borrow pits in Domoni has been prepared by the PIU on October 2023 and will be reviewed and approved by the World Bank and disclosed before the launching of the construction of Port Boingoma. The SOP2 components are a continuity and complementarity of the SOP 1 activities at Port Boingoma which focused on the construction of a breakwater along the quays, superstructure and access roads; improving maritime transport connectivity and safety between the islands, by supporting to improving secondary port infrastructures at Ouroveni in Grande Comore and Vassy in Anjouan. Key environmental risks and impacts related to the improvement of the existing secondary Ports under SOP2 include perturbation of marine habitat and potential damage to marine biotopes during dredging; port waste and pollution control, pollution from the dredged material; occupational and community health & safety issues and potential increase in road or traffic-related accidents especially during construction. The infrastructure improvement in the secondary Ports will likely involve small to medium civil works, with noise, vibration, dust, traffic, and possible community safety concerns. Potential impacts to biodiversity may arise because the port site is within the boundary of the protected area of Moheli. A stand-alone ESIA will be prepared when the technical studies of secondary ports are completed, and on the basis of environmental and social terms of reference approved by the World Bank. The secondary port ESIA with its ESMP shall be approved by the World Bank and disclosed in the country before launching of secondary port construction. Before the commencement of civil works, the selected contractor should develop, implement, and comply with the C-ESMP. The SOP2 will also support project implementation and capacity building to improve maritime safety regulations, support local community activities where local people are affected by the project, for example, through supporting the national fishery and maritime education systems, and

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implement measures to increase women’s voice for safety and personal security in the maritime transport sector. During the operation of the port and improved landing sites, environmental risks may include storm-water runoff, handling or storage of hazardous cargo and its movement through populated areas, health, safety and security issues in the Port areas. To mitigate these risks, the provisions in the existing SOP1-ESMF for secondary ports under SOP2 is accompanied by Labor Management Procedures (LMP) and a sexual exploitation and abuse (SEA)/SH Risk Assessment and Action Plan as separate instruments.

**A.2 Social Risk Rating**

Substantial

*[Summary of key factors contributing to risk rating, in accordance with the ES Directive and the Technical Note on Screening and Risk Classification under the ESF – Max. character limit 4,000]*

Social Risk is assessed as Substantial, due to likely labor influx, some resettlement, and traffic safety risks from construction activities. Port infrastructure improvements and quarrying and transport of materials for Boingoma port (and other ports as needed) will require laborers. While most labor will be hired locally for civil works, there will be some labor influx from outside Comoros or between the three islands. Further, the risk of poor working conditions that are not in line with ESS 2 and Comorian labor laws also require mitigation measures. Risks related to labor include use of child labor, forced/bonded labor and discrimination in hiring unless specific measures are in place to check these practices. Other risks related to infrastructure building and port improvements are community health and safety risks during infrastructure construction, through increased traffic, movement of machinery and materials etc. This can lead to impacts on health through emissions, increased noise and road accidents. For infrastructure construction and port improvements an ESIA (for Boingoma Port), a Resettlement Policy Framework (RPF) and an ESMF prepared under SOP1 were revised for SOP2, and an ESIA and RAP prepared for the Domoni quarry and transportation corridor to Boingoma port, to be reviewed by the World Bank and disclosed before Boingoma Port works begin. There is no anticipated land taking in Boingoma port itself, which belongs to the Government, while there may be some displacement of livestock or small-scale agricultural activities at the Domoni quarry site. ESIAs, ESMPs will be prepared for selected secondary ports in Ouroveni and Vassy . Economic impacts such as crop losses and other livelihood losses may occur, and if so, RAPs or Livelihood Restoration Plans (LRPs) will be prepared. Under SOP2, a new subcomponent (pilot program of new passenger boats) will not replace the informal COMA 4 fleet but aims to demonstrate socioeconomic benefits from safer and more reliable maritime passenger services, by commissioning two to four larger passenger boats. Despite the small number of boats to be commissioned, their entry into transportation market may have an economic impact on some informal passenger boat operators. These impacts may be offset by increased local economic activities due to improved maritime passenger and cargo connectivity to and from the upgraded Boingoma port and new secondary ports. A social assessment will be carried out to identify opportunities for providing support to local community activities and small business development, financing (i) needs assessment for local business development (sustainable fishery, eco-tourism and agribusinesses) in local communities affected by the project, with particular focus on vulnerable groups, such as low-income households, women and youth, and current small boat operators and crews that may be affected by the new larger passenger boats (ii) vocational training to generate sustainable fishing and other maritime jobs in the islands, including tourism, and (iii) local pollution protection measures at the landing sites.. The ESIA for Boingoma Port prepared for SOP 1, ESIA for Quarries prepared for SOP2, and SOP 1 ESMF revised for SOP 2 include guidance on traffic management and managing the spread of infectious diseases including COVID-19. The risk of SEA/SH was assessed as substantial mainly due to labor influx. The risk of conflicts with communities and lack of awareness about the project will also need to be addressed as this can create resentment among local residents. Vulnerable or marginalized persons or groups, including women, illiterate persons, low-income households, disabled and other

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marginalized groups can be left out of consultations unless consultations are specifically designed to include such groups.

*[Summary of key factors contributing to risk rating. This attribute is only for the internal version of the download document and not a part of the disclosable version – Max. character limit 8,000]*

## **B. Environment and Social Standards (ESS) that Apply to the Activities Being Considered**

### **B.1 Relevance of Environmental and Social Standards**

**ESS1 - Assessment and Management of Environmental and Social Risks and Impacts**

Relevant

*[Explanation - Max. character limit 10,000]*

ESS1 is assessed as relevant. The Project is likely to generate a wide range of significant adverse risks and impacts on human populations and the environment because of the complex nature of the Project and environmental context. Long term, permanent and irreversible impacts due to the nature of Project activities are anticipated. A standalone ESIA/ESMP for the port of Boingoma and an ESMF for the construction of secondary ports were prepared and disclosed by the PIU, both in January 2022, for the programmatic approach under SOP 1. A preliminary ESIA/ESMP was prepared for six potential quarry sites, followed by an in-depth ESIA/ESMP for the selected Domoni quarry site and transport corridor between the quarry site and Hoani Beach barge transfer site, under SOP2. Based on the project design and the social and environmental profile from ESMF and the three prepared ESIAEs, the potential risks and impacts are related to the following: (i.) Land acquisition required for the construction area, (ii.) Environmental pollution (soil, air, noise) related to water turbidity, demolition, dredging operation, accidental spills, solid waste and effluent, concrete laitance, exhaust gas, noise and vibration, asbestos contaminated materials (from demolition of existing structures), sludge generation by the dredging and the demolition operations ...etc, (iii.) Road degradation due to equipment and construction materials transportation, (iv.) Loss of marine habitat/resources, (v.) Pressure and competition on drinking water resources due to the needs of the construction site, (vi.) Community health and safety such as risks related to Gender Based Violence (GBV) and Sexual Exploitation and Abuse (SEA) and spread of infectious diseases, accidents, and road safety during construction phase, (vii.) Potential labor influx into the project area during construction owing to opportunistic settlements and migrant workers seeking employment, (viii.) Navigation disruption and related accident risks within the fairway and the turning circle, (ix.) Change in the current and sedimentation dynamics due to the embankment and the breakwater construction, (x.) Exposure of construction site staff and residents to COVID-19 and other diseases including HIV/AIDS, (xi.) Pressure on the quarries and borrow pits for raw construction materials. The selected Domoni quarry site and its activities which are considered Substantial risk, could generate occupational and community health & safety issues and potential increase in road or traffic-related accidents especially during construction and transportation with noise, vibration, dust, traffic, and possible community safety concerns. The ESIA and ESMP focused on the selected Domoni quarry site was prepared by the PIU in October 2023, to be reviewed and approved by the World Bank and will be disclosed before the launching of Port Boingoma construction. A standalone ESIA for secondary ports also will be prepared upon completion of the technical studies the selected secondary port sites, based on E&S ToRs approved by the Bank. The secondary ports ESIA and ESMP will be approved by the Bank and disclosed in country before launching of secondary port works. The approved ESIA/ESMP and Environmental and social mitigation measures will be captured in

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Contractor Environmental and Social Management Plan (C-ESMP) during the construction phases for Boingoma and operational secondary ports. The government identified two priority sites for secondary ports: Vassy and Ouroveni. Vassy was included in the original ESMF, but Ouroveni is new. It is located 5-10 minutes away from Chindini, an earlier secondary port candidate, in the same area but located at the other side of a cape. Ouroveni is considered a better port location because of more modest waves. The ESIA for Boingoma Port SOP 1 phase defines mitigation measures for construction and operational phases, roles and responsibilities, time plans, costs and implementation procedures for each mitigation measure recommended. A marine biodiversity assessment was conducted as part of the ESIA prepared for Boingoma port under SOP 1, which concluded that the marine ecosystem is composed of modified habitat. The risks and impacts could be reduced at acceptable level by using of dredging technologies and protective screens to limit the dispersion of resuspended particles and materials. It was recommended to develop a coral reef restoration plan in collaboration with the forestry services before launching of port operations. The project's susceptibility to climate change related hazards, such as sea level rise, erosion, flooding has been assessed and the port rehabilitation design and civil works have considered specific measures to manage and reduce the risks to include in the C-ESMP and ESMS for the Port Authority. The Boingoma Port ESIA also provides assessment and guidance on managing community health and safety risks related to GBV and COVID-19, management of labor and GRM. For the quarry, an ESIA/ESMP was prepared by the PIU and will be reviewed and approved by the World Bank and disclosed prior launching of the bidding process for the construction of Port Boingoma. Borrow pit sites were screened as part of the quarry ESIA, and a RAP was prepared and will be implemented before the beginning of works and taking of any lands. The ESIA for the selected Domoni quarry site did not identify any particular significant adverse risks and impacts related to quarrying activities necessitating non-standard mitigation measures for these activities as provided in the World Bank Group EHS Guidelines for Construction Materials Extraction. Before the start of civil works, the contractor will prepare the Contractor Environmental and Social Management Plan (C-ESMP) for the construction of Port Boingoma and the C-ESMP for the selected Domoni quarry site. These instruments will be submitted for World Bank approval. Labor Management Procedures and suggested measures to address SEA/SH Risks are contained in standalone LMP and separate SEA/SH Action plan prepared for SOP1 and updated for SOP2. Construction Contractors will be required, as a condition of their contracts, to develop, implement and comply with the C-ESMP, that will include all necessary specific management plans and procedures provided in the ESIA and ESMF. During the SOP 1 preparation, the ESIA for the port of Boingoma (next to Fomboni town) and the ESMF for the secondary ports were disclosed in the country on January 18, 2022 and on the External WB website on January 20, 2022. Additional ESF instruments (RPF, LMP, SEP, including GRM, and ESCP) were consulted and disclosed prior to the SOP1 Appraisal, both in-country and on the Bank's website. These ESF documents (including ESIA, ESMF, LMP, and SEP) were revised to include additional information on SOP activities and were redisclosed before SOP2 appraisal. Under SOP2, the pilot program of new passenger boats will not replace the informal small boat fleet but aims at demonstrating socioeconomic benefits from safer and more reliable maritime passenger services by commissioning 2 to 4 boats. The implementation of this program may create some economic impacts for some small informal passenger boat operators. But these impacts may be offset by increased economic activities due to improved maritime passenger and cargo connectivity to and from the upgraded Boingoma port and new secondary ports. A social assessment will be carried out to identify opportunities for providing support to local community activities and small business development, financing (i) needs assessment for local business development (sustainable fishery, eco-tourism and agrobusinesses) at local communities affected by the project, with particular focus on vulnerable groups, such as low-income households, women and youth, and current small boat operators and crews that may be affected by the new larger passenger boats, (ii) vocational training to generate sustainable fishing and other maritime jobs in the islands, including tourism, in collaboration with the National Fishery and Marchant Sailor School (Ecole Nationale

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de la Pêche et de la Marine Marchande, ENPMM), and (iii) local pollution protection measures at the landing sites. The Bank team has applied for Japan Social Development Fund (JSDF) resources to scale up this community development activity. If the grant request is accepted, it will be managed as a standalone RETF project. Prior to the operation phase, the Ministry of Maritime and Air Transport will be expected to develop and implement an Environmental and Social Management System (ESMS) for the operation of the Boingoma (Fomboni) Port and the two secondary Ports. This ESMS will include measures for managing risks and impacts related to the operational phase consistent with ISO 14001 and ISO 45001 standards, and a Grievance Mechanism (GM) for all stakeholders during the operation phase. Prior study has indicated that the potential private sector contribution to capital investment may be limited due to the small size of Port Boingoma. If additional donors commit funds to invest in Port infrastructure construction, all ESF principles and requirements will be applied on all project components. The ESMF will be updated if required to cover the CERC Component while carrying out technical studies, to screen and propose mitigation measures related to implementing emergency activities in case the CERC component is activated. The Ministry of Transport will develop and implement an Environmental and Social Management System (ESMS) for port operations, to be managed by the Port Authority, consistent with good international industry practice for environmental and social managing of port operations.

**ESS10 - Stakeholder Engagement and Information Disclosure**

Relevant

*[Explanation - Max. character limit 10,000]*

ESS 10 is assessed as relevant. A Stakeholder Engagement Plan (SEP) was developed for the program during SOP1 preparation, which will continue to guide the consultation processes and stakeholder engagement throughout the life cycle of the project, including SOP2, starting from preparation through implementation. During the ESIA exercise, stakeholder mapping was conducted and stakeholders were identified in the different project intervention zones. Stakeholders are Ministry of Maritime and Air Transport, boat operators, commercial users of Boingoma port, coastal communities, travelers and service providers for travelers and port operations. Given that the Boingoma port is located within the protected area of Moheli, the RENAP must be involved in the stakeholder engagement process. Stakeholder mapping has also analyzed the influence of these stakeholders on project design and implementation and the project's impacts on them. Special attention has been given to inclusion of women, vulnerable and project affected people, as well as other interested groups. Based on stakeholder mapping, the Borrower prepared a SEP for SOP1, which was revised and updated for SOP2, including a detailed schedule of planned engagement activities for the various stakeholders during the project cycle and specifications for format and frequency of these engagements. The SEP will ensure all consultations are inclusive and accessible. It also includes a project Grievance Mechanism (GM), which became operational from January 2023. Local GRM committees, government officials and other community stakeholders on the three islands received awareness raising and training on GRM processes in December 2022 and January 2023. The initial SEP prepared and disclosed prior to SOP 1 appraisal was revised, updated and redisclosed for SOP2, including additional community consultations during SOP2 preparations. The SEP will be updated annually during project implementation or as needed when major project developments occur.

**ESS2 - Labor and Working Conditions**

Relevant

*[Explanation - Max. character limit 10,000]*

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ESS2 is assessed as relevant. The proposed program (including SOP1 and SOP2) will involve direct workers, contracted workers and primary supply workers. Labor/contracted workers during construction are expected to be employed by the project. In Comoros, where overseas migration to find work is rampant, labor requirements are often supplied from outside the project areas. Labor Management Procedures (LMP) were outlined in the ESIA and a standalone LMP was prepared for SOP1 and revised, updated and redisclosed for SOP1 AF and for SOP2. The Project Implementation Unit (PIU) includes approximately 20 workers including contracted and direct workers. The due diligence assessment of Boingoma port estimated an amount of 150 workers are needed for construction and supervision contractors. A Workers Camp Management Plan will be elaborated as part of the C-ESMP for Boingoma port and reviewed and approved by the Bank before the beginning of works. The information related to the number of workers for secondary ports will be provided and analyzed in the standalone ESIA to these ports. The potential for workers camps was assessed in the ESIA and requirements and guidance to develop these (if needed) will be provided in C-ESMPs. The PIU also has and will continue to contract consultants for specialist studies. No community workers will be employed by the project. The project will also use primary supply workers. These will be employed by parties expected to provide materials to the project such as construction material, suppliers of trucks for port construction sites and other services etc. The LMP prepared under SOP1 and updated to include SOP2 activities includes an assessment of labor related risks for direct and contract workers such as those related to working conditions, Occupational Health and Safety, inequality and discrimination and provides guidance on their mitigation. These risks include inadequate and inappropriate working conditions for workers which are not aligned with local legislation and ESS2, discrimination, inequality of opportunity, violence (particularly SEA/SH), child and forced labor, inappropriate health and safety conditions, and denial of right for workers to organize. Labour risks related to other categories of workers were as well taken into consideration in the LMP, which also contains a workers' Grievance Redress Mechanism (GRM). 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 General Guidelines 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. An SEA/SH Action Plan originally prepared for SOP1 will be updated and implemented to mitigate and manage workplace SEA/SH risks. The PIU will be responsible for the overseeing measures related to labor management and working conditions. The PIU will hire one or more staff directly responsible to undertake the overall implementation of the Project in compliance with the provisions on labor and working conditions; ensure that contractors prepare their work management procedures which comply with the LMP, OHSP and the C-ESMP before the work commences, ensure that contractors/ sub-contractors respect their obligations towards contract workers, ensure that the potential risks of child labor, forced labor and serious safety concerns for primary supply workers are addressed, monitor the training of workers affected by the project; ensure that the complaints mechanism for project workers and PIU is established and implemented and that procedures are in place for workers to sign the Code of Conduct for Workers and any other measures, aimed at addressing the risks of sexual exploitation and abuse (SEA) / sexual harassment (SH) including regular training on SEA/SH prevention and response. The Supervision Engineer will also employ staff to monitor the implementation of labor related measures on behalf of the PIU. Construction companies will be responsible for appointing specialists to manage labor, occupational health and safety issues. They will include measures related to health and safety and labor in their Construction ESMPs which will be approved before civil works. Contractors will also oversee the adherence of their subcontractors to the LMP, maintain records of recruitment and employment of contract workers (including subcontractors) with age verification to avoid child labor, provide induction and regular training to contract workers

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on environmental, social, occupational health and safety issues, require primary suppliers to identify and address the risks of child labor, forced labor, and serious safety concerns, as well as the risks of equity and discrimination. Contractors will also develop and implement their own Grievance Mechanism (GM) for contract workers, ensure that all contractor and subcontractor workers understand and sign the Code of Conduct before work begins and take all other measures to deal with the risks of SEA/SH.

**ESS3 - Resource Efficiency and Pollution Prevention and Management**

Relevant

*[Explanation - Max. character limit 10,000]*

ESS3 is assessed as relevant. During the SOP1 preparation for the Program, due diligence identified that dredging and rehabilitation of Boingoma Port and the two secondary Ports in the Islands could generate pollution from the construction materials, disturb the marine habitat and cause potential damage to marine ecosystem. Analysis conducted as part of the ESIA prepared for Boingoma Port concluded that the material subject to dredging is not contaminated with heavy metals and hazardous substances. Disposal options for the dredged material were identified and evaluated in accordance with ESS3. It was determined in the port civil works design that the dock is used for storage of the dredging and de-rocking materials. A Dredging Management Plan has been prepared to minimize the impacts on the water quality and marine habitats. This plan is expected to be included as an Annex to the upcoming C-ESMP. For Boingoma port, it is expected up to 10,500 m<sup>3</sup> of dredged materials will be produced. These materials are likely to be reused for construction projects at the Island. However, an onshore dumping site, combined with mechanical and/or physico-chemical dehydration processes are planned to appropriately manage the dredged materials. Construction of temporary worker camps for the construction/rehabilitation of ports are also activities expected to generate pollution. The implementation of mitigation measures such as management plans for construction materials will be applied to reduce and minimize the impact of contamination and pollution to marine and terrestrial areas during construction will be included in contractors' ESMPs, and residual impacts are expected to be limited in scope and duration. During construction phase, air emissions will include exhaust from heavy vehicles and machinery, and fugitive dust generated by construction activities. Those most likely to be affected are workers on site and people living within the proximity of the construction sites. The implementation of mitigation measures such as dust suppression and vehicle maintenance will be applied to minimize the impact of air emissions during construction, and residual impacts are expected to be limited in scope and duration. For the Boingoma port expansion under SOP 1 and the two secondary ports under SOP 2, construction activities will generate solid and liquid waste which will primarily include excavated soil and hazardous waste such as hydrocarbon oils from construction machinery and vehicles. The waste generated by the construction works will largely be disposed of at approved sites according with the national laws and regulations. During the operation of the port and improved landing sites, environmental risks may include storm-water runoff and handling or storage of hazardous cargo. Specific Waste Management Plans shall be developed for Boingoma port and the secondary ports, respectively in the C-ESMP before launching civil works. The site-specific ESIA/ESMPs for Boingoma Port and each secondary Port, as recommended in the ESMF prepared under SOP 1 will manage risks relevant to this standard during preparation, construction. Project susceptibility to Climate change related hazards, such as sea level rise, erosion, and flooding have been assessed. The port rehabilitation design and civil works have considered specific measures to manage climate hazard risks. The ESMS to be developed for the port will develop a natural hazard risk preparedness plan before port operation phase. During construction, the greenhouse gas emissions generated by the project are not expected to be substantial given the rehabilitation nature of the works. During operation, the proposed project is expected to contribute to the reduction of greenhouse gas emissions through the reduction of vessel fuel consumption intensity, resulting from the

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improved operational capacity of Boingoma port, which will allow a wider range of ships and better utilization, reducing emissions per unit of freight-carriage, the more efficient cargo transportation among the islands due to the adoption of larger vessels on the secondary ports under this SOP2 and more fuel-efficient vessels. The site-specific ESIA/ESMPs for Boingoma Port and each secondary Port should manage risks relevant to this standard during preparation, construction, and operational phases. The project has conducted a study on water resources needed by the quarry operations. These results have concluded that water resources are available in terms of quality and quantity for the project's needs without any conflict of use with the local population's water supply.

**ESS4 - Community Health and Safety**

Relevant

*[Explanation - Max. character limit 10,000]*

ESS4 is assessed as relevant. During the construction phase, project activities have the potential to expose communities to health and safety risks especially in those communities that are situated immediately close to the Port construction activities. Communities could also be affected by the potential labor influx and SEA/SH risks. During the preparation of SOP1 for the Program, the Borrower assessed SEA/SH risks through preparation of a SEA/SH Risk Assessment and Action Plan. Influx of workers is the main underlying factor contributing to the risk of SEA/SH in the project. SEA/SH risks can be increased mainly due to (i) the influx of a portion of the workforce, including foreign laborers and Comorians who move temporarily between islands for construction work, some of whom may be far from their families; (ii) increasing the disposable income of workers which can increase the incidence of prostitution (iii) the proximity of the sites to establishments such as schools, markets or other places frequented by women and girls. The Risk Assessment identifies mitigation measures to address this risk including creating awareness on SEA/SH, instituting a GBV-sensitive GRM, information on which is widely disseminated to the community, inclusion of SEA/SH requirements in tender documents, ensuring that Contractors meet their obligation to establish an Action Plan for the prevention of SEA/SH, including an Accountability and Intervention Framework, integrating the Action plan in the ESMP, development and signing of a Code of Conduct on SEA/SH for all workers and ensuring that GBV specialists are recruited at PIU, Supervision Engineer and Contractor level. This SEA/SH Risk Assessment and Action Plan was reviewed and revised for SOP2 to assess the risks of quarries and borrow pits, as well as for new secondary ports and including prevention and mitigation measures. Transportation of dredging materials related to the Boingoma port expansion SOP 1 and vehicle traffic during the civil works for SOP1 and SOP 2 will expose communities to health and safety risks from increased traffic during construction. Access to marine transport will also be impacted and measures will need to be in place to minimize health and safety risks where passenger access sites are re-located during construction. Guidance on managing risks related to traffic has been provided in the ESIA and ESMF. The Boingoma Port ESIA also includes detailed guidance on management of risks related to marine accidents during the operational phase. The ESIA for Boingoma port is composed of an existing safety and security zones. For the secondary ports, additional ESIA's will include a social assessment to analyze the impacts on coastal livelihoods and recommend proper measures to keep the ecosystem providing regulating services or significant provisioning to local communities. These recommendations will be incorporated into ESMPs and implemented as Coastal Community Development activities. 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 civil works take place, 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. During the operations phase,

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measures to ensure the health and safety of passengers will be included in the ESMS to be developed for the Ministry of Maritime and Air Transport. This will provide guidance on managing boat and passenger safety. The C-ESMP shall conduct a Risk Hazard Assessment (RHA) for the activities during the civil works that have the potential to generate emergency event. Based on the results of the RHA, the enterprise shall prepare an Emergency Response Plan (ERP) as part of the C-ESMP in coordination with the relevant local authorities and the affected communities. For the operational phase of Boingoma Port, the borrower shall conduct a Risk Hazard Assessment (RHA) for the activities during the port operations that have the potential to generate emergency events or incidents. Based on the results of the RHA, the port authority shall prepare an Emergency Response Plan (ERP) part of the ESMS in coordination with the relevant local authorities and the affected communities.

**ESS5 - Land Acquisition, Restrictions on Land Use and Involuntary Resettlement**

Relevant

*[Explanation - Max. character limit 10,000]*

Port improvement and construction is expected to require minimal, if any, land acquisition, as land occupied by Boingoma and the secondary ports generally belongs to the Government. However, screening and preparation of site-specific RAPs where necessary will provide evidence of land ownership and provide information about any existing claims and/or land use that will need to be compensated. For Boingoma Port, a screening was undertaken as part of the ESIA and has shown that no RAP will be needed. A RAP was prepared for the Domoni quarry site and transport corridor used to carry construction materials to Boingoma port. This RAP will be implemented before construction starts at Port Boingoma. For secondary ports, fields with crops may be impacted by access roads. Smaller ports may also require the development of worker camps which will entail temporary land acquisition. RAPs will be prepared and implemented for each port site where necessary. All RAPs will address permanent and temporary land acquisition as well as economic impacts related to formal and informal use of land. An RPF prepared at SOP1 stage and revised and updated for SOP2 provides guidance on managing risks related to land acquisition and resettlement. RAPs will be prepared by a consulting firm and will be implemented by a RAP Service Provider firm to be hired during SOP2 Project implementation. A Social Specialist has been hired by the PIU and is responsible for overall guidance and supervision on resettlement. The expansion of the Boingoma port and the development of minor infrastructures offshore and at landing sites is expected to disturb the maritime traffic in the area e.g. for the artisanal fisherman and local people who are using the small boats for their daily transportation between the islands (potentially for their jobs). This perturbation may have economic impacts on fisherman. Guidance and procedures are indicated in the revised ESMF to develop LRPs with livelihood restoration measures for those affected by restriction of access to fishing sites or other sources of livelihoods. The implementation of the SOP2 pilot program for introducing 2-4 new passenger boats may create some economic impacts for some small informal passenger boat operators. But these impacts may be offset by increased economic activities due to improved maritime passenger and cargo connectivity to and from the upgraded Boingoma port and new secondary ports. A social assessment will be carried out to identify opportunities for providing support to local community activities and small business development, financing (i) needs assessment for local business development (sustainable fishery, eco-tourism and agrobusinesses) at local communities affected by the project, with particular focus on vulnerable groups, such as low-income households, women and youth, and current small boat operators and crews that may be affected by the new larger passenger boats (ii) vocational training to generate sustainable fishing and other maritime jobs in the islands, including tourism, in collaboration with the National Fishery and Marchant Sailor School (Ecole Nationale de la Pêche et de la Marine Marchande, ENPMM), and (iii) local pollution protection measures at the landing sites. The Bank team

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has applied for Japan Social Development Fund (JSDF) resources to scale up this activity. If the grant request is accepted, it will be managed as a standalone Recipient-Executed Trust Fund (RETF) project.

**ESS6 - Biodiversity Conservation and Sustainable Management of Living Natural Resources**

Relevant

*[Explanation - Max. character limit 10,000]*

ESS6 is assessed as relevant. The project has the potential to cause adverse impacts on marine and terrestrial biodiversity around each Port site. The project will also disturb the marine habitat and potentially damage marine biotopes during dredging operation. A marine biodiversity assessment has been conducted as part of the ESIA prepared for Boingoma port under SOP 1, which concluded that the marine ecosystem is composed of modified habitat. The risks and impacts could be reduced to acceptable levels by using of dredging technologies and protective screens to limit the dispersion of resuspended particles and materials. The preparation of a biodiversity management plan (BMP) is not required. But it is necessary to develop a coral reef restoration plan in standalone document prepared by the RENAP and the construction contractor, in collaboration with the forestry services, before launching of works and relevant experts. During the operational phase of the port, it is recommended that ships must implement a ballast water management plan with record system, and the harbor master's office must keep records of the types of waste landed on the vessels. A monitoring system of the physical and chemical quality of water should be maintained in collaboration with the regional direction of the environment, the ANAM and the National Park of Mohéli. The Port Authority will prepared the ESMS to consider the integrity/fragmentation of marine habitats due to marine works, impacts resulting from both construction activities and O&M activities, emergency events and indirect impacts such as increased access to previously inaccessible marine resources / areas should be considered and implemented with the regional direction of the environment, the ANAM and the National Park of Mohéli. Similarly, the port authority ESMS will include the requirement to verify inbound ships' Ballast Water Management Plan, as per IMO's International Convention for the Control and Management of Ships' Ballast Water and Sediments (2004).

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

Not Currently Relevant

*[Explanation - Max. character limit 10,000]*

This ESS7 is not relevant as there are no communities nor people who meet the World Bank criteria for Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities in Comoros.

**ESS8 - Cultural Heritage**

Relevant

*[Explanation - Max. character limit 10,000]*

ESS8 is assessed as relevant. Based on preliminary information in the ESIA for Boingoma port and ESMF for the secondary ports prepared for the program during SOP1 and SOP2 preparation, the sites that could be potentially affected by the project do not include any cultural heritage. But guidance on "Chance Find Procedures" have been included in the ESMF and ESIA's 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 closely coordinate with the relevant mandated Government authority for the salvaging and restoration of such cultural heritage.

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**ESS9 - Financial Intermediaries**

Not Currently Relevant

*[Explanation - Max. character limit 10,000]*

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

**B.2 Legal Operational Policies that Apply**

**OP 7.50 Operations on International Waterways**

No

**OP 7.60 Operations in Disputed Areas**

No

**B.3 Other Salient Features**

**Use of Borrower Framework**

No

*[Explanation including areas where "Use of Borrower Framework" is being considered - Max. character limit 10,000]*

The use of Borrower Framework will not be considered for this project in whole or in part.

**Use of Common Approach**

No

*[Explanation including list of possible financing partners – Max. character limit 4,000]*

A Common Approach is not anticipated to be applied at this time. The French Development Agency (AFD) has contributed funds to support the project, and discussions are underway for additional financing from the African Development Bank and Islamic Development Bank. Given the World Bank’s lead role in the project, the project activities will be will be implemented using ESF standards and national Comorian laws and regulations.

**B.4 Summary of Assessment of Environmental and Social Risks and Impacts**

*[Description provided will not be disclosed but will flow as a one time flow to the Appraisal Stage PID and PAD – Max. character limit 10,000]*

Environmental and Social Risks: The project’s Environmental and Social Risk Classification (ESRC) is High, reflecting a High Environmental Risk classification and Substantial Social Risk classification. More information on the risk classifications and the eight of ten Environmental and Social Standards which apply to the project can be found in the Appraisal-Environmental and Social Risk Summary (A-ESRS). All ten Environmental and Social Standards (ESSs) apply with exception of ESS 7 and ESS9 which are not relevant to the project.

The Environment Risk is assessed High related to activities to enhance the port capacity of Port Boingoma quarry operations and installing proper infrastructure at selected secondary ports.. Key environmental risks and impacts related to the improvement of the existing Boingoma Port infrastructure in Moheli Island and secondary ports in the three islands

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include perturbation of marine habitat and potential damage to marine biotopes during dredging, port waste and pollution control, pollution from the dredged material, occupational and community health and safety issues, and potential increase in road or traffic-related accidents especially during construction and transportation of dredged material. The infrastructure improvement in the Boingoma Port will likely involve heavy civil works, with noise, vibration, dust, traffic, and possible community safety concerns. Potential impacts to biodiversity may arise because the port site is in the protected area of Moheli. The Domoni quarry site activities, which are considered Substantial risk, could generate occupational and community health and safety issues and potential increase in road or traffic-related accidents especially during construction and transportation with noise, vibration, dust, traffic, and possible community safety concerns. During the operation of the port and improved landing sites, environmental risks may include storm-water runoff, handling or storage of hazardous cargo and its movement through populated areas, health, and safety and security issues in the port areas.

The Social Risk is assessed as Substantial, due to likely labor influx, some resettlement, and traffic safety risks from construction activities. Port infrastructure improvements and quarrying and transport of materials for Boingoma port (and other ports as needed) will require laborers. While most labor will be hired locally for civil works, there will be some labor influx from outside Comoros or between the three islands. Further, the risk of poor working conditions that are not in line with ESS 2 and Comorian labor laws also require mitigation measures. Risks related to labor include use of child labor, forced/bonded labor and discrimination in hiring unless specific measures are in place to check these practices. Other risks related to infrastructure building and port improvements are community health and safety risks during infrastructure construction, through increased traffic, movement of machinery and materials etc. This can lead to impacts on health through emissions, increased noise and road accidents.

The SEA/SH Risk is assessed as Substantial which is mainly linked to labor influx and large civil works. In particular, labor influx can create situations that contribute increased risk of SEA/SH. The project's SEA/SH Risk Assessment prepared under SOP1 and updated for SOP2 has identified several measures to ensure that SEA/SH risk is mitigated and that there are protocols in place in case of such incidents.

Environmental and Social Safeguard Instruments. Environmental and Social Impact Assessments (ESIA)/ Environmental and Social Management Plans (ESMP) for the port of Boingoma and an Environmental and Social Management Framework (ESMF) for the construction of secondary ports were prepared and disclosed by the client, both in January 2022, along with a Resettlement Policy Framework (RPF). A supplementary ESIA with its ESMP for the quarry borrow pits in Domoni and quarry materials transport corridor was prepared for review and approval by the World Bank and will be disclosed before launching the construction of Port Boingoma and Domoni quarry site activities. The Project's SOP1 SEP, LMP and SEA/SH Action Plan were updated to include SOP2 activities and redisclosed during SOP2 appraisal and prior to negotiations. Before the start of civil works, the contractor will prepare the Contractor Environmental and Social Management Plans (C-ESMP) for the construction of Port Boingoma and the Domoni quarry site. Additional ESIA/ESMPs, C-ESMPs and RAP (if needed) will be prepared for the secondary port sites. A social assessment will be carried out before works begin on secondary ports to identify opportunities for providing support to local community activities and small business development, with particular focus on vulnerable groups, such as low-income households, women and youth, and informal boat operators and crews that may be affected by the arrival of the new larger passenger boats. Currently, the Bank team applied for Japan Social Development Fund (JSDF) resources to scale up this activity. If the grant request is accepted, it will be managed as a standalone Recipient-Executed Trust Fund (RETF) project.





Borrower Environmental and Social institutional arrangements, capacity and commitment. The project’s PIU includes a social specialist, an environmental specialist and a GBV and Gender specialist who oversee the implementation of E&S risk management aspects under SOP1 and SOP2. The Social and Environmental Specialists received their first ESF training session in 2022, with additional training provided in 2023 conducted by the WB team. The WB team will provide ongoing ESF training and support consistent with ESCP, ESMF and ESIA recommendations in 2024 and beyond.

### **C. Overview of Required Environmental and Social Risk Management Activities**

#### **C.1 What Borrower environmental and social analyses, instruments, plans and/or frameworks are planned or required by implementation?**

*[Description of expectations in terms of documents to be prepared to assess and manage the project’s environmental and social risks and by when (i.e., prior to Effectiveness, or during implementation), highlighted features of ESA documents, other project documents where environmental and social measures are to be included, and the related due diligence process planned to be carried out by the World Bank, including sources of information for the due diligence - Max. character limit 10,000]*

The following instruments were previously prepared:

- Environmental and Social Impact Assessments (ESIA)/ Environmental and Social Management Plans (ESMP) for the port of Boingoma and an Environmental and Social Management Framework (ESMF) for the construction of secondary ports were prepared and disclosed by the PIU, in January 2022, along with a Resettlement Policy Framework (RPF).
- A preliminary ESIA and ESMP for six potential quarry sites was prepared and disclosed on April 19, 2023, as part of SOP2 preparations.
- An additional in-depth ESIA with ESMP for the quarry in Domoni and transport corridor was prepared by PIU for review, approval and disclosure by the World Bank before launching of construction of Port Boingoma.
- A RAP and Livelihood Restoration Plan for the DOmoni quarry and transport corridor was prepared and will be cleared, disclosed and implemented before launching of works in Port Boingoma that require quarry materials.
- Updates to include SOP2 activities were prepared by PIU for relevant SOP1 instruments, including the SEP (with project GM) (cleared and disclosed on February 6, 2024, and LMP (including worker GM) and SEA/SH Risk Assessment and Action Plan, both cleared and disclosed by SOP2 Negotiations.

Additional Instruments to be prepared for SOP2 include the following:

- PIU preparation of ESIA, ESMP and RAP for the selected secondary port sites, prior to start of secondary port works
- Contractors to prepare ESMPs (C-ESMPs) for Boingoma Port, quarry and transport corridor and secondary port construction activities, including Occupational Health and Safety Plan (OHSP), Community Health and Safety Plan, Security Management Plan (for use of security subcontractors), Traffic Management Plan, Waste Management Plan, Risk Hazard Assessment for civil works, Worker GRM, SEA/SH prevention and response measures, Coral Reef Restoration Plan (in collaboration with RENAP and forestry service).
- Ministry of Maritime and Air Transport to prepare Environmental and Social Management System (ESMS) prior to beginning Boingoma and secondary port operations, including Natural Hazard Risk Preparedness Plan, Emergency Response Plan and Ship Ballast Water Management Plan.



**III. CONTACT POINT**

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**V. APPROVAL**

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