



**MINISTRY OF AGRICULTURE, FISHERIES,
ENVIRONMENT, TOURISM AND HANDICRAFT**

**National Direction of Agricultural and Livestock
Strategies**

**The Government of Union of Comore
Ministry of Finance Budget and Banking / Ministry of
Agriculture, Fisheries
Environment, Tourism and Handicraft**

**FOOD SYSTEM RESILIENCE PROGRAM PROJECT
FSRP-KM - P177816**

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

DRAFT FOR NEGOTIATION

March 2023

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Government of Union of Comoros (hereinafter the Recipient) is implementing the Food System Resilience Program - FSRP-KM-P177816 (the Project), with the involvement of the Ministry of Agriculture, Fisheries, Environment, Tourism and Handicraft and the PIDC as the Project Implementation Unit (PIU), with the involvement of, inter alia, the Ministry of Finance (MoF), Budget and Banking as set out in the Financing Agreement and the Project Agreement. The International Development Association (the Association) has agreed to provide the original financing (P164584) for the Project, as set out in the referred agreement.
2. The Recipient shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Association. The ESCP is a part of the Financing Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreement.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Recipient shall carry out or cause to be carried out, including, as applicable, the timeframes of the actions and measures, institutional, staffing, training, monitoring and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, and in form and substance, and in a manner acceptable to the Association. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the Association.
4. As agreed by the Association and the Recipient, this ESCP will be revised from time to time if necessary, during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the Recipient through the PIU and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient through the General Secretary of the Ministry of Agriculture, Fisheries, Environment, Tourism and Handicraft. The Recipient shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
MONITORING AND REPORTING			
A	REGULAR REPORTING		
	<p>Prepare and submit to the Association regular monitoring reports on the (i) environmental, social, health and safety (ESHS) performance of the Project, in form and substance acceptable to the Bank. The regular reports will include but not limited to the implementation of the (ii) Environmental and Social Management Framework (ESMF), (iii) status of preparation and implementation of E&S instruments required under the ESCP, (iv) Stakeholder Engagement Plan (SEP), (v) implementation of the Labor Management Procedures (LMP), (vi) Grievance Mechanism (GRM) and (vii) SEA/SH Action Plan.</p>	<p>Submit Quarterly reports to the Association throughout Project implementation, commencing after the Effective Date. Submit each report to the Association no later than 15 days after the end of each reporting period.</p>	<p>Project Implementation Unit (PIU)</p>
B	INCIDENTS AND ACCIDENTS		
	<p>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, <i>inter alia</i>,</p> <ul style="list-style-type: none"> - cases of sexual exploitation and abuse (SEA), sexual harassment (SH), - accidents that result in death, serious or multiple injury, and - intoxication. <p>Provide sufficient details regarding the scope, severity, and possible causes of 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/or supervising firm, as appropriate.</p> <p>Subsequently, at the Association’s request, prepare a report on the incident or accident and propose any measures to address it and prevent its recurrence.</p> <p>For SEA/SH incidents, ensure confidentiality for the survivor and the alleged perpetrator.</p>	<p>Notify the Association no later than 48 hours after learning of the incident or accident.</p> <p>Provide subsequent report to the Association within a timeframe acceptable to the Association</p>	<p>PIU</p>
C	CONTRACTORS’ MONTHLY REPORTS		
	<p>Require contractors and supervising firms to provide monthly monitoring reports on ESHS performance in accordance with the metrics specified in the respective bidding documents and contracts, and submit such reports to the Association.</p>	<p>Submit the monthly reports to the Association upon request and as annexes to the reports to be submitted under action A above.</p>	<p>PIU</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS		
1.1 ORGANIZATIONAL STRUCTURE		
<p>a) Establish and maintain a Project Implementation Unit (PIU) within the Ministry of Agriculture, Fisheries, Environment, Tourism and Handicraft with qualified staff and resources to support management of ESHS risks and impacts of the Project including an Environmental Specialist, a Social Specialist, and a GBV Specialist.</p> <p>b) Establish and maintain Regional Implementation Units (RIU) with 1 Assistant Environmental Specialist and 1 Assistant Social Specialist staff, with proven experiences in the context of E&S compliance, to support management of ESHS risks and impacts of the Project at each regional area.</p>	<p>a) Hire the Environmental Specialist, the Social Specialist and the GBV Specialist no later than two (02) months after the Project Effective Date, and thereafter maintain these positions throughout Project implementation.</p> <p>b) Hire the Assistant E&S specialists at each region no later than three (03) months after the Project Effective Date, and thereafter maintain these positions throughout Project implementation.</p>	<p>Ministry of Agriculture, Fisheries, Environment, Tourism and Handicraft</p>
1.2 ENVIRONMENTAL AND SOCIAL INSTRUMENTS		
<p>a) Prepare, adopt, disclose and implement the following instruments consistent with the relevant ESSs:</p> <ul style="list-style-type: none"> i) Environmental and Social Management Framework (ESMF) for the Project including a SEA/SH Action Plan and a waste management plan ii) Integrated Pest Management Plan (IPMP); iii) Labor Management Procedures (LMP) iv) Stakeholder Engagement Plan (SEP) iv) Resettlement Framework (RF); <p>b) Prepare, adopt and implement subproject Environmental & Social assessment instruments and corresponding Environmental and Social Management Plan (Environmental and Social Impact Assessments, Environmental and Social Management Plan), consistent with the relevant ESSs as set out in the ESMF. The proposed subprojects described in the exclusion list set out in the ESMF shall be ineligible to receive financing under the Project.</p>	<p>a) Draft ESMF including the draft of the SEA-SH Action Plan and the waste management plan, and IPMP, to be developed before end of appraisal and will be finalized prior to disbursement of Components 1; 2 and 3, and thereafter disclose and implement throughout Project implementation. Any subsequent updates shall be submitted to the Association for approval. LMP as indicated under 2.1.; RF as indicated under 5.1 below, SEP as indicated under 10.1 below,</p> <p>b) Adopt the relevant subproject instruments prior to the bidding process and prior to carrying out for the respective subproject that requires such instruments, and thereafter implement throughout Project implementation.</p>	<p>PIU</p>
1.3 MANAGEMENT OF CONTRACTORS		
<p>a) Incorporate the relevant aspects of the ESCP, including, <i>inter alia</i>, the relevant E&S instruments, the Labor Management Procedures, and Code of conduct, into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply and cause subcontractors to comply with the ESHS specifications of their respective contracts.</p>	<p>a) ESHS specifications integrated as part of the preparation of procurement documents and respective contracts. Supervise contractors throughout Project implementation.</p>	<p>PIU</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	b) Cause contractors, subcontractors and supervising firms to prepare, adopt and implement a Contractor-ESMP (C-ESMP) – work site, Hygiene, Health, Safety and Environment Plan (HSEP), Environmental and Social Clauses, Codes of Conduct, Grievance Mechanism, Social Commitments on Child Labor and other elements provided for in the GBV/SEA/SH Action Plan included in ESMF.	b) Adopt the C-ESMP prior to carrying out any relevant works and implement throughout Project implementation	
1.4	TECHNICAL ASSISTANCE (TA)		
	a) Ensure that the consultancies, studies (including feasibility studies), capacity building, training, and any other technical assistance activities under the Project are carried out in accordance with terms of reference acceptable to the Association, that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the Terms of reference (TOR). b) Develop, consult upon and disclose a Strategic Environmental and Social Assessment (SESA) for TA activities of component 1 and 2, and consistent with	a) Throughout Project implementation, ensuring that Terms of Reference (TORs) for the TA under the Project are submitted to the Association for non-objection prior to launching the relevant bidding process. b) SESA to be developed at the same time of the development of the TA activities.	PIU
1.5	CONTINGENT EMERGENCY RESPONSE FINANCING		
	a) Ensure that the CERC Manual includes a description of the ESHS assessment and management arrangements in accordance with the ESSs. b) Prepare and adopt any environmental and social (E&S) instruments which may be required under the CERC component, in accordance with the CERC Annex of the ESMF, the CERC Manual and the ESSs, and thereafter implement the measures and actions required under said CERC E&S instruments, within the timeframes specified in said E&S instruments.	a) The adoption of the CERC Manual and, if applicable, other instruments, as relevant in form and substance acceptable to the Association are a withdrawal condition for the CERC component in accordance of Section XX of Schedule 2 to the Financing Agreement for the Project. b) Adopt any required CERC E&S instruments and include it as part of the respective bidding process, if applicable, and in any case, before the carrying out of the relevant Project activities for which the E&S instrument is required. Implement the CERC E&S instruments in accordance with their terms, throughout Project implementation.	PIU
1.6	ACTIVITIES SUBJECT TO RETROACTIVE FINANCING		
	Develop E&S audit of activities conducted for the elaboration of instruments during the project preparation which will be subject to retroactive financing under the Project in order to identify any required actions to ensure that such activities meet the requirements of the	E&S audit to be finalized not later than three (03) months after effective date	PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	ESSs and of the ESMF. Therefore ensure that corrective action plan is developed in compliance with the requirements of ESMF.		
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	LABOR MANAGEMENT PROCEDURES		
	a) Adopt and implement Labor Management Procedures (LMP) for the Project including, inter alia, provisions on working conditions, management of workers relationships, occupational health and safety (including personal protective equipment, and emergency preparedness and response), Code of conduct (including relating to SEA and SH), forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms.	a) The project LMP shall be disclosed prior end of appraisal and thereafter implement the LMP throughout Project implementation. Any subsequent updates to the LMP shall be submitted to the Association for approval prior to implementation.	PIU
	b) Ensure the signing of contracts, including the Code of conduct, with all direct workers, contracted workers and primary supplier workers consistent with the LMP.	b) Prior engaging any Project workers. Before the start of Project staff service and thereafter maintain throughout the Project implementation.	
2.2	GRIEVANCE MECHANISM FOR PROJECT WORKERS		
	Establish and operate a Grievance redress mechanism (GRM) for Project workers, as described in the LMPs and consistent with ESS2 and the National law.	The GRM approved shall be operational prior to engaging Project workers and thereafter maintain and operate it throughout Project implementation.	PIU
2.3	OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES		
	Adopt and implement specific provisions for pandemic health barrier measures such as Covid-19 for Project workers, to be developed under the ESMF and include these measures in the LMP and relevant ESIA/ESMPs in a manner satisfactory to the Association.	Same timeframe as under Section 1.2 (b) for the ESMPs and 2.1(a) for the LMP, above, respectively.	PIU
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	WASTE MANAGEMENT PLAN		
	Prepare, adopt and implement a Waste Management Plan (WMP), as part of the ESMF to manage hazardous and non-hazardous wastes, consistent with ESS3.	Same timeframe as under 1.2(a) above.	PIU
3.2	PEST AND PESTICIDE MANAGEMENT		
	Prepare, adopt and implement an Integrated Pest Management Plan (IPMP), consistent with the ESS3	Same timeframe as under 1.2(a) above	PIU
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	TRAFFIC AND ROAD SAFETY		
	Incorporate measures to manage traffic and road safety risks as required in the ESMP to be prepared under Component 3.	Same timeframe as under 1.2(b) above.	PIU
4.2	COMMUNITY HEALTH AND SAFETY		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Assess and manage specific risks and impacts to the community arising from Project activities, including, <i>inter alia</i> , behavior of Project workers, risks of labor influx, propagation of COVID-19 risks for local population; personnel security risks, response to emergency situations, agricultural operation production risks, and include mitigation measures in the ESMPs to be prepared in accordance with the ESMF.	Same timeframe as under 1.2(b) above.	PIU
4.3	SEA AND SH RISKS		
	a) Prepare, adopt and implement SEA-SH Action Plan, as part of the ESMF to assess and manage the risks of SEA and SH. b) Integrate Codes of conduct and SEA-SH prevention measures into contractual and procurement documents (ToRs, bidding documents, workers' contracts)	a) Same timeframe as under 1.2(a) above. Any subsequent SEA-SH Action Plan update shall be submitted to the Association for approval before implementation. Once approved, the SEA-SH Action Plan must be implemented throughout Project implementation. b) During preparation of procurement documents (ToRs, bidding documents, workers' contracts)	PIU
4.4	SECURITY MANAGEMENT		
	If needed, assess security risks and implement measures to manage the security risks of the Project, including the risks of engaging security personnel to safeguard Project workers, sites, assets, and activities, as needed, as set out in the ESMF. Detailed management and mitigation measures to be outlined in the site specific ESMPs or Security Management Plan, guided by the principles of proportionality and GIIP, and by ESS4 and applicable law, in relation to hiring, rules of conduct, training, equipping, and monitoring of such personnel.	Prior to engaging security personnel and thereafter implemented throughout Project implementation.	PIU
4.6	DAM SAFETY (ANNEX 1, PARA. 5. ESS4)		
	Engage qualified and experienced engineers to design dam safety measures for the dams, in accordance with WB's Good Practice Note on Dam Safety (Oct 2020) and Good International Industry Practice (GIIP), and, thereafter, adopt and implement such measures.	Prior to Bidding process launching	PIU
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	RESETTLEMENT FRAMEWORK		
	Prepare, adopt and implement a Resettlement Framework (RF), consistent with ESS5.	Adopt and disclose an advanced draft of RF before end of appraisal and finalize prior to disbursement of sub-Components 1; 2 and 3, and thereafter implement throughout Project implementation.	PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
		Any subsequent updates shall be submitted to the Association for approval.	
5.2	RESETTLEMENT PLANS		
	a) Prepare, adopt and implement Resettlement Plans (RPs), and Livelihood Restoration Plans (LRPs), as necessary, for each activity under the subproject for which the RF requires such RP/LRP, as set out in the RF, and consistent with ESS5 and in a manner satisfactory to the Association.	a) Adopt and implement the respective RP/LRP before the start of any activity inducing the need of land acquisition and/or involuntary resettlement, including ensuring that before taking possession of the land and related assets, full compensation has been provided and as applicable displaced people have been resettled and moving allowances have been provided.	- PIU - RIU
	b) Develop and submit to the Association progress report on the Resettlement Plan implementation, and develop and submit to the Association a completion report of the Resettlement Plan implementation	b) Each report shall be submitted to the Association for approval before the start of the related work.	
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	BIODIVERSITY RISKS AND IMPACTS		
	Adopt and implement if needed mitigation measures to manage biodiversity impacts in accordance with the measures described in the ESMF and consistent with the provisions of ESS 6, in a manner acceptable to the Association.	Same timeframe as under 1.2(b) above.	PIU
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
Not relevant			
ESS 8: CULTURAL HERITAGE			
8.1	CULTURAL HERITAGE RISKS AND IMPACTS		
	Prepare, adopt and implement Chance Find Procedures as part of the ESMF and subsequently the ESMP, consistent with ESS8.	Same timeframe as under 1.2(b) above.	PIU RIU
ESS 9: FINANCIAL INTERMEDIARIES			
Not relevant			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION		
	Prepare, adopt, disclose and implement a Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, which include measures to, inter alia, provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.	Develop and disclose the SEP by appraisal, and thereafter implement the SEP throughout Project implementation.	PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
		Any subsequent updates to the SEP shall be submitted to the Association for approval. Once approved, the SEP shall be implemented throughout the implementation of the Project	
10.2	PROJECT GRIEVANCE MECHANISM		
	<p>Establish, publicize, maintain, and operate an accessible grievance mechanism, to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10.</p> <p>The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.</p>	<p>Establish and publicize the project's GM at the same timeframe as the SEP under Action 10.1 above. Update the GM periodically if needed.</p> <p>Any subsequent updates to the GM must be submitted to the Association for approval prior to implementation. Once approved, the GM shall be operationalized and monitored throughout Project implementation</p>	PIU
CAPACITY SUPPORT			
CS1	<p>Develop and submit to the Association a Capacity Building Plan for PIU staff including:</p> <ul style="list-style-type: none"> • Stakeholder mapping and engagement • Specific aspects of environmental and social assessment • Emergency preparedness and response • Community health and safety • Occupational Health and Safety • Incident reporting • ESF, ESS and World Bank Group EHS Guidelines • Health and safety of workers and communities • GBV risk mitigation • Inclusion of vulnerable and disadvantaged groups in the consultation process • Grievance Mechanism • Development, implementation, monitoring and reporting in accordance with the LMP • Awareness and prevention on sexually transmitted infections: HIV/AIDS, etc. 	<p>Adopt the Capacity Building plan (CBP-PIU) no later than 03 months after the Effective date and implement during the implementation of the Project.</p> <p>Any subsequent updates to the CBP-PIU as a result of additional capacity need assessment during project implementation shall be submitted to the Association for approval...</p>	PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<ul style="list-style-type: none"> • Awareness on GBV, SEA-SH and child protection • Raising awareness on barrier measures against the spread of Covid-19 • Implementation of RPs • 		
CS2	<p>Develop and submit to the Association a Capacity Building Plan for Contractors and sub-contractors on</p> <ul style="list-style-type: none"> • Introduction to the ESF, ESS and World Bank Group EHS Guidelines • Implementation of ESMPs, including: <ul style="list-style-type: none"> - Health and safety of workers and communities - GBV awareness, control and prevention - Emergency preparedness and response - Grievance mechanism - Development, implementation, monitoring and reporting in accordance with the LMP - Awareness and prevention of sexually transmitted infections: HIV/AIDS etc. - Awareness on measures against the spread and control of Covid-19 • Occupational health and safety including on: <ul style="list-style-type: none"> - Emergency prevention and preparedness - Response arrangements to emergency situations - Incident reporting (ESIRT Protocol) 	<p>Adopt the Capacity Building plan (CBP-C) no later than 03 months after the Effective date and implement during the implementation of the Project. Any subsequent updates to the CBP-C as a result of additional capacity need assessment during project implementation shall be submitted to the Association for approval.</p>	PIU
CS3	<p>Develop and submit to the Association a Capacity Building Plan for other stakeholder staff and communities on:</p> <ul style="list-style-type: none"> • Introduction to the ESF, ESS and World Bank Group EHS Guidelines • Community health and safety • GBV awareness, control and prevention • Grievance mechanism • SEP Implementation 	<p>Adopt the Capacity Building plan (CBP-S) no later than 03 months after the Effective date and implement during the implementation of the Project. Any subsequent updates to the CBP-S as a result of additional capacity need assessment during project implementation shall be submitted to the Association for approval.</p>	PIU