



Combined Project Information Documents / Integrated Safeguards Datasheet (PID/ISDS)

Appraisal Stage | Date Prepared/Updated: 14-Nov-2019 | Report No: PIDISDSA27808

**BASIC INFORMATION****A. Basic Project Data**

Country Comoros	Project ID P171633	Project Name Social Safety net program	Parent Project ID (if any) P150754
Parent Project Name Comoros Social Safety Net Project	Region AFRICA	Estimated Appraisal Date 31-Oct-2019	Estimated Board Date 18-Dec-2019
Practice Area (Lead) Social Protection & Jobs	Financing Instrument Investment Project Financing	Borrower(s) Union of Comoros	Implementing Agency Ministry of Health, Solidarity and Social Protection

Proposed Development Objective(s) Parent

The Project Development Objective is to increase poor communities' access to safety net and nutrition services.

Proposed Development Objective(s) Additional Financing

Increase poor communities' access to safety net, nutrition, and community services

Components

Component 1: Establishing a Productive and Disaster Responsive Safety Net

Component 2: Improving the Nutrition of Young Children and Mothers from Poor Communities

Component 3: Strengthening Safety Net Management, Coordination, and Monitoring and Evaluation

PROJECT FINANCING DATA (US\$, Millions)**SUMMARY**

Total Project Cost	18.00
Total Financing	18.00
of which IBRD/IDA	18.00
Financing Gap	0.00

DETAILS**World Bank Group Financing**

International Development Association (IDA)	18.00
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IDA Grant	18.00
Environmental Assessment Category	
B-Partial Assessment	
Decision	
The review did authorize the team to appraise and negotiate	

Other Decision (as needed)

B. Introduction and Context

Country Context

- 1. Comoros is a small nation made up of three islands (Grande Comore, Anjouan, and Mohéli) with an estimated population of 800,000**, densely populated over a total territory of no more than 1,800 square kilometers. Like other small island nations, the UoC is characterized by, and a considerable dependence on food imports and remittances. Comoros' development performance since 1975 has been shaped by three defining characteristics: (a) the challenging economic geography, with geographical isolation, limited resources, a small domestic market, and a narrow export base; (b) political fragility and the weakness of formal institutions; and (c) remittances that have contributed to deepening a consumption driven growth trajectory and uneven progress towards shared prosperity by raising many Comorians out of poverty while leaving those behind who cannot rely on diaspora networks. (Systematic Country Diagnostic, 2019)
- 2. Comoros remains vulnerable to macroeconomic volatility caused primarily by weak fiscal policy and a lack of fiscal space for investment in infrastructure and social sectors.** Since the end 2000s, the average real growth rate of GDP per capita was 0.3 percent as the low pace of growth of the economy could not keep up with high fertility rates. The low level of domestic revenues along with a small tax base, the dependency on volatile foreign grants, the increasing expenditures on the wage bill and subsidies, and the accumulated arrears have all reduced the fiscal space available to the Government of Comoros. This has severely constrained much-needed public spending on infrastructure and on social sectors such as health, education, and social safety nets.
- 3. Poverty remains widespread, especially in rural and remote areas.** Comoros has achieved poverty rates comparable with those of richer countries in its income group, but regional disparities exist. Six out of ten Comorians can be considered non-poor at the international poverty line for lower-middle income countries (USD 3.2 per day). However, the average disguises poverty differences across islands and across the rural and urban divide. Those living in Anjouan and Mohéli are 8 and 6 percent more likely to live in poverty than those living in Grande Comore. The main drivers of poverty in Comoros are family size and the sector of employment and educational attainment of the head of household. Poverty among



households consistently increases with the number of children, reaching 70 percent among households with five or more children, compared to less than 20 percent among households with no children. Poverty is high among those working in agriculture.

4. **The Comorian population is very exposed to natural disasters** such as (i) hydrometeorological outbursts such as tropical storms, floods, and sea level rise; and (ii) geophysical occurrences such as earthquakes, volcanic eruptions, and landslides. A 2005 World Bank Report on natural disaster "hotspots" estimated that 54.2 percent of the population is living in areas at risk of such disasters, the number of which have sharply increased in Comoros. After they occur, the incomes of many households drop as a result of losing all or part of their crops and/or assets. Rural populations are particularly exposed. Since 2005, nearly half of Comoros's population has been affected by a natural disaster. Overall, direct losses caused by natural hazards in Comoros are estimated to be US\$5.7 million each year. This is equivalent to 0.9 of Comoros GDP and 2.8 percent of the Government's annual budget in 2017.

5. **Cyclone Kenneth hit Comoros on April 24th and 25th 2019 affecting 345,000 people or 43 percent of the population in 242 villages on the three islands.** The cyclone has resulted in an official death toll of six people (as of July 2019), more than 153 people injured, and at least 11,000 displaced people. 4,854 houses were destroyed and 465 classrooms and 147 water cisterns damaged. The humanitarian support, led by the General Directorate for Civil Security (*Direction Générale de la Sécurité Civile*, or DGSC) which is the government agency in charge of disaster risk management (DRM), has been delivering food, water and sanitation, organizing the delivery of basic health, installing temporary shelters, and other services.

Sectoral and Institutional Context

6. **Social protection systems that would protect the poor, such as social safety nets, are limited in Comoros.** Existing social protection schemes cover only a small part of the population (less than 10 percent) and are not targeted toward the poor. The retirement fund for old-age, disability and death of civil servants and private sector employees, currently provides pensions to 10% of the population of over 65 years old. (SCD 2019)

7. **The Comoros Social Safety Net project (SSNP) has supported the establishment of a Productive and Disaster Responsive Safety Net.** It has built institutional and operational foundations for a longer-term safety net for the poorest households in selected communities; and provided regular cash and preventive nutrition services to targeted poor families in exchange for their participation in productive cash-for-work activities benefiting poor, labor-constrained households in the poorest 69 villages of Comoros. It also helped establish an immediate short-term safety net for disaster-affected households and communities by post-disaster cash transfers and the rehabilitation and reconstruction of small village infrastructure damaged by natural disasters.

8. **Capacities to respond to climate related shocks remain limited.** Comoros has made adaptation and mitigation a priority in its 2015 Nationally Determined Contributions (NDC) as part of the Paris Agreement, however, capacity weaknesses hamper the ability of the country to respond to climate change related shocks. Priority actions include relocation and protection programs for the population living at-risk areas as well as early-warning systems and effective interventions for emergencies. However, the effectiveness



of existing legal frameworks and tools suffers from weak cross-sector coordination, unclear coordination roles and responsibilities, low resources and lack of relevant and current data. As a result, the country remains among the most vulnerable countries to climate change risks, while being one of the least prepared to deal with it.

C. Proposed Development Objective(s)

Original PDO

The Project Development Objective is to increase poor communities' access to safety net and nutrition services.

Current PDO

Increase poor communities' access to safety net, nutrition, and community services.

Key Results

- Beneficiaries of Safety Nets programs - Cash-for-work, food-for-work and public works
- Direct project beneficiaries (of which female)
- Rehabilitated and reconstructed infrastructure sub-projects
- Households benefiting from post-disaster activities
- economic recovery grants provided for self- or wage-employment and income generating activities

D. Project Description

9. **The proposed Additional Financing (AF) to the Comoros SSNP aims to contribute to the recovery needs arising from Kenneth Cyclone.** The proposed activities are consistent with the original Project Development Objective (PDO) and strategically aligned with the FY20-24 Country Partnership Framework (CPF) for Comoros. These activities comply as well as the recovery plan¹ and the Government's Accelerated Growth and Development Strategy (SCAD2) of Comoros. The US\$18 million IDA grant will finance economic recovery grants for income generating activities of disaster affected poor households for resilience building, as well as the rehabilitation of selected community-based infrastructure damaged by the cyclone. It will cover the disaster response subcomponent 2.1 of the SSN project, and component 3 on SSN management, coordination and monitoring and Evaluation (M&E).

Component 1: **Establishing a Productive and Disaster Responsive Safety Net**

Sub-component 1.2: **Ensuring an Early Recovery Response to Natural Disasters**

10. The additional financing will finance the sub-component 1.2 which will support two activities: (a) economic recovery grants, and (b) rehabilitation and reconstruction of damaged infrastructure. The first activity is economic recovery grants to 10,000 selected poor households for a total cost of US\$ 10 million. The intervention will include business planning and training in improved agricultural practices for livelihood development; parental education, sensitization on health, nutrition, family planning and financial literacy at the household level; and follow-up support to beneficiaries to sustain their economic inclusion activities. To this end, the project would explore collaboration with other sectors and partners

¹ Union des Comores. Évaluation de l'impact du Cyclone Kenneth & Plan de Relèvement et de Reconstruction June 2019.



such as the Ministry of Labor, and the Ministry of Production (Agriculture and Livestock). This AF will ensure complementarity and synergies with initiatives of other donors and the World Bank Group to promote economic inclusion and resilience. Finally, this first activity will help boost women's empowerment and participation in household budget management and encourage the female heads of the household to receive the livelihood grant. The coverage of the economic recovery grant for post-disaster response will follow the geographic coverage determined by the DGSC guidelines, and also include information from the country's poverty map and the number of households affected by the cyclone. The second activity is rehabilitation and reconstruction of damaged infrastructure (US\$ 5 million), which was already included under the original sub-component 1.2 and therefore will need no change in design.

Component 3: Strengthening Safety Net Management, Coordination, and Monitoring and Evaluation.

11. This component will continue to strengthen the institutional capacity to manage the coordination, monitoring, and evaluation of the social protection system. Component 3 will receive additional funding of US\$ 3 million to carry out the administration, coordination, monitoring and evaluation of the activities under the AF. This includes the provision of equipment, operating costs and technical assistance. It also includes funding of monitoring and evaluation activities.

E. Implementation

Institutional and Implementation Arrangements

12. **Institutional arrangements.** The Social Safety Net project has implemented by ANACEP whose objective is to prepare, coordinate and monitor all investment and development projects in the country. Based on request of the Government and to ensure quick implementation, the additional financing project will be moved under the Ministry of Health and Solidarity (under the *Direction de la solidarité*). An institutional assessment of the implementation arrangements, with a focus on operational, fiduciary and safeguard capacities, found that they are adequate given that the entire project staff will be moved to the new institution and that they continue to work on the project.

F. Project location and Salient physical characteristics relevant to the safeguard analysis (if known)

Nationwide involving all three Islands of the Union of the Comoros.



G. Environmental and Social Safeguards Specialists on the Team

Erik Reed, Environmental Specialist
Andrianjaka Rado Razafimandimby, Social Specialist
Hasina Tantelinirina Ramarson Ep Rafalimanana, Social Specialist

SAFEGUARD POLICIES THAT MIGHT APPLY

Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	Yes	<p>The Environmental Assessment policy is been triggered due to the fact that the proposed project will finance key civil works activities, namely repair and/or rehabilitation of small scale village infrastructure damaged by natural disasters. These civil work activities will be undertaken through a consultative and participatory process meant to foster ownership and social accountability. Overall, the proposed sub-projects are expected to be small in scale and site specific, typical of category B projects. Consequently their potential adverse environmental and social impacts will be very limited due to their localized, small scale and site specific nature, albeit minor. In addition, the cash for works activities meant to provide cash to targeted poor families in exchange for their participation in small group community work activities may not expose them to significant risks of HIV/AIDS, nor damage to existing physical social environment. However, if adequate mitigation measures are not considered on time to ensure these risks are contained and/or minimized to the maximum possible, the ultimate impacts would be serious.</p> <p>Since the physical locations of the proposed project activities to be repaired and/or rehabilitated are unknown at this stage, the Borrower has updated an Environmental and Social Management Framework (ESMF) . This ESMF were cleared and disclosed, both in-country and at the World bank website on November 5, 2019.</p>
Performance Standards for Private Sector Activities OP/BP 4.03	No	This policy is not relevant for the project.



Natural Habitats OP/BP 4.04	No	This policy is not triggered as activities of the project don't have impact on Natural Habitats.
Forests OP/BP 4.36	No	This policy is not relevant for the project.
Pest Management OP 4.09	No	This policy is not relevant for the project.
Physical Cultural Resources OP/BP 4.11	No	This policy is not relevant for the project.
Indigenous Peoples OP/BP 4.10	No	This policy is not relevant for the project as there is no Indigenous Peoples in Comoros.
Involuntary Resettlement OP/BP 4.12	Yes	<p>The project is been socially and environmentally categorized as B and has triggered the Involuntary Resettlement Policy (OP/BP 4.12) on the basis of component 1 foreseen activities; therefore, to ensure due compliance with the policy requirement when the clear footprint of the project is unknown, the Government of the Union of the Comoros has updated the existing Resettlement Policy Framework (RPF). The main purpose of the RPF is to clarify applicable resettlement principles, organizational arrangements, and design criteria. Its objectives are consistent with avoiding or minimizing involuntary resettlement or land acquisition where possible; where unavoidable, ensuring that compensation and site specific resettlement action plans (RAPs) are designed and implemented with sustainability as the prime focus; and ensuring that affected persons are supported to improve their livelihood or at least restore them to pre-displacement levels. The RPF sets out the basic principles and prerogatives to be followed when footprints become known, namely the legal and administrative framework, which includes the systems of land ownership and tenure as well as the socio-economic characteristics of beneficiary districts. It also details the consultation and participation processes, eligibility criteria, and methodology for valuation of assets and a clear entitlement policy and compensation payment processes, as well as a grievance redress mechanism and an estimated budget to ensure adequate implementation of the RPF. In order to ensure that implementation of the RPF is on course and accountability aligned, the RFP has articulated monitoring and evaluation with clear delineations of monitoring indicators and the responsibilities of agencies. The RPF were updated, cleared, disclosed,</p>



both in-country and at the World bank website on November 5, 2019.

Safety of Dams OP/BP 4.37	No	This policy is not relevant for the project.
Projects on International Waterways OP/BP 7.50	No	This policy is not relevant for the project.
Projects in Disputed Areas OP/BP 7.60	No	This policy is not relevant for the project.

KEY SAFEGUARD POLICY ISSUES AND THEIR MANAGEMENT

A. Summary of Key Safeguard Issues

1. Describe any safeguard issues and impacts associated with the proposed project. Identify and describe any potential large scale, significant and/or irreversible impacts:

The proposed AF activities (Component 1. Establishing a Productive and Disaster Responsive Safety Net. Subcomponent 1.2: Early Recovery Response to Natural Disasters/ rehabilitation/reconstruction of damaged infrastructure) are expected to have limited environmental and social safeguard impacts as they consist of small transfers for Economic recovery grants, capacity building & training, as well as the provision of technical assistance, materials, equipment and operational costs. Project activities could produce some adverse negative impacts, like minor accidents, loss of livelihoods and / or land, water pollution, social conflicts and gender-based violence (GBV), security issue (mainly related to the economic recovery grant). Social risks related to the staff management should be also considered, such as cases of moral harassment or abuse of authority. The Gender-based violence (GBV) risk for the project was assessed as low. However, the project will pay attention to prevent and address possible GBV or cases of SEA because of mobilization of short-term workers close to local communities mainly during infrastructures rehabilitations. Overall, the potential adverse social risks and impacts of both the original project and the proposed AF are expected to be small in scale and site specific, typical of category B projects. There is no potential large scale, significant and/or irreversible impacts associated with the original project or with the activities proposed for the additional credit. The proposed activities/sub-projects will be undertaken through a consultative and participatory process meant to foster ownership and social accountability.

2. Describe any potential indirect and/or long term impacts due to anticipated future activities in the project area: The planned sub-projects are not expected to incur any potential indirect and/or long term impacts resulting from the repair and/or rehabilitation of small scale sub-projects. It is not expected to have long term adverse environmental and social impacts on future activities in the potential project areas. Overall project impacts are considered modest and will be site specific. The PIU has experience and has implemented sub-projects in the past in a satisfactory manner under the ongoing Comoros Emergency Crisis Response Project (P120631) financed by IDA.

3. Describe any project alternatives (if relevant) considered to help avoid or minimize adverse impacts. Given that this project is a continuation of the successful of the ongoing Comoros Emergency Crisis Response Project (P120631) financed by IDA, project alternatives were not considered.

4. Describe measures taken by the borrower to address safeguard policy issues. Provide an assessment of borrower capacity to plan and implement the measures described. Since the exact physical locations of future civil works activities, namely repair and/or rehabilitation of small scale



village sub-projects, as well as their potential localized adverse environmental and social impacts could not be identified prior to the appraisal of the proposed project, the Borrower has prepared (updated): (i) an Environmental and Social Management Framework (ESMF); and (ii) a Resettlement Policy Framework (RPF). The RPF outlines the policies and procedures to be followed in the event that resettlement action/compensation plans will need to be prepared to mitigate potential adverse social impacts due to land acquisition. The ESMF outlines an environmental and social screening process for future sub-projects to ensure that they are environmentally and socially sound and sustainable. The ESMF also includes: (i) a basic description of the natural and physical environment of the targeted project intervention zones in the three Islands of Comoros; (ii) a clear and coherent process to assess environmental and social impacts of subprojects to be financed which were improved with the lesson learned and the best practices developed by the current IDA financing; (iii) guidelines to adequately mitigate (avoid, minimize or reduce) any environmental and social impacts from financed subprojects; (iv) an environmental and social management Plan (ESMP) with an estimated budget and timelines; (v) public consultations and stakeholder participation with women, youth and vulnerable groups, municipalities and members of the local communities; (vi) a grievance redress mechanism that provides clearer guidance on how potential grievances will be handled throughout the project cycle; (vii) a monitoring and evaluation mechanism; and (viii) a medical waste management plan for the health centers to be financed under the proposed project.

The project has extensive experience in implementing IDA operations as noted with the ongoing Comoros Emergency Crisis Response Project. The project unit's safeguards unit is composed of an environmental and a social safeguards specialist who are tasked with ensuring compliance with environmental and social safeguards policies for all activities financed under the Project. This arrangement will be maintained under the new Social Safety Net Project.

5. Identify the key stakeholders and describe the mechanisms for consultation and disclosure on safeguard policies, with an emphasis on potentially affected people.

Key stakeholders include women, youth and vulnerable groups, the municipalities and the local communities. The Social Safety Net Project preparation process included a participatory consultative process. Extensive public consultations have been conducted during the preparation of the ESMF and RPF to take into account the views and perceptions of communities and various stakeholders regarding the design and scope of the project. The project has extensive experience engaging public consultations and also in the Bank's disclosure policy. During the implementation of the proposed project, the PIU initiated a public consultation process including making relevant materials available in a form and language(s) acceptable and accessible to all beneficiaries involved. The ESMF and RPF were disclosed in the country, including on each island, and in the World bank website on November 5, 2019.

B. Disclosure Requirements (N.B. The sections below appear only if corresponding safeguard policy is triggered)

Environmental Assessment/Audit/Management Plan/Other

Date of receipt by the Bank	Date of submission for disclosure	For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors
21-Aug-2019	05-Nov-2019	

"In country" Disclosure



Comoros
05-Nov-2019

Comments

Resettlement Action Plan/Framework/Policy Process

Date of receipt by the Bank
21-Aug-2019

Date of submission for disclosure
05-Nov-2019

"In country" Disclosure

Comoros
05-Nov-2019

Comments

If the project triggers the Pest Management and/or Physical Cultural Resources policies, the respective issues are to be addressed and disclosed as part of the Environmental Assessment/Audit/or EMP.

If in-country disclosure of any of the above documents is not expected, please explain why:

C. Compliance Monitoring Indicators at the Corporate Level (to be filled in when the ISDS is finalized by the project decision meeting) (N.B. The sections below appear only if corresponding safeguard policy is triggered)

OP/BP/GP 4.01 - Environment Assessment

Does the project require a stand-alone EA (including EMP) report?

No

OP/BP 4.12 - Involuntary Resettlement

Has a resettlement plan/abbreviated plan/policy framework/process framework (as appropriate) been prepared?

Yes

If yes, then did the Regional unit responsible for safeguards or Practice Manager review the plan?

Yes

Is physical displacement/relocation expected?

TBD

Is economic displacement expected? (loss of assets or access to assets that leads to loss of income sources or other means of livelihoods)

TBD



The World Bank Policy on Disclosure of Information

Have relevant safeguard policies documents been sent to the World Bank for disclosure?

Yes

Have relevant documents been disclosed in-country in a public place in a form and language that are understandable and accessible to project-affected groups and local NGOs?

Yes

All Safeguard Policies

Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies?

Yes

Have costs related to safeguard policy measures been included in the project cost?

Yes

Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies?

Yes

Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents?

Yes

CONTACT POINT

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APPROVAL

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Approved By

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Country Director:	Emre Ozaltin	15-Nov-2019

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