

# INTEGRATED SAFEGUARDS DATA SHEET CONCEPT STAGE

**Report No.:** ISDSC1042

**Date ISDS Prepared/Updated:** 07-Dec-2014

**Date ISDS Approved/Disclosed:** 08-Dec-2014

## I. BASIC INFORMATION

### A. Basic Project Data

<b>Country:</b>	Comoros	<b>Project ID:</b>	P150754
<b>Project Name:</b>	Comoros Social Safety Net Project (P150754)		
<b>Task Team Leader:</b>	Andrea Vermehren		
<b>Estimated Appraisal Date:</b>	01-Dec-2014	<b>Estimated Board Date:</b>	17-Mar-2015
<b>Managing Unit:</b>	GSPDR	<b>Lending Instrument:</b>	Investment Project Financing
<b>Sector(s):</b>	Other social services (80%), Health (20%)		
<b>Theme(s):</b>	Natural disaster management (20%), Social safety nets (50%), Nutrition and food security (20%), Other rural development (10%)		
<b>Financing (In USD Million)</b>			
Total Project Cost:	6.00	Total Bank Financing:	6.00
Financing Gap:	0.00		
<b>Financing Source</b>			<b>Amount</b>
BORROWER/RECIPIENT			0.00
IDA Grant			6.00
Total			6.00
<b>Environmental Category:</b>	B - Partial Assessment		
<b>Is this a Repeater project?</b>	No		

### B. Project Objectives

The objective of the project is to establish the building blocks of a safety net to reach selected extreme poor and disaster-affected households through the provision of additional sources of income and nutrition services

### C. Project Description

The proposed project would build on the successful implementation and lessons learned from the

Comoros Emergency Crisis Response Project implemented by the FADC (Fonds d'Appui au Développement Communautaire), as well as global experiences, in particular from other countries in Africa, Latin-America, South and East Asia. It provides an opportunity to further develop the conceptual framework and institutional capacity to offer safety net, disaster response and nutrition services to strengthen poor families' and communities' resilience to poverty and natural disasters. It would: (i) support the establishment of a productive safety net and systems that would provide cash-for-work opportunities for selected poor families with a view to strengthen their productive capacity, (ii) provide support to communities and households affected by disasters, by providing emergency cash-for-work, supporting immediate cleaning and removal of debris after disasters, and rehabilitating damaged community infrastructure, (iii) improve nutrition of children under five years of age, and (iv) strengthen the institutional capacity for safety net management, coordination, monitoring and evaluation.

The project would be governed by the country's Social Protection (SP) and Nutrition policies. The SP policy is presently being developed by the Ministry of Health & Solidarity, in collaboration with the Ministry of Labor. The Nutrition policy has already been developed by the Ministry of Health & Solidarity but lacks implementation. In addition, the project would establish an explicit link between social protection instruments (such as cash for work activities and community development/ infrastructure) and use these linkages as a response mechanism in the context of the country's disaster risk management (DRM) framework. Sub-projects will be guided by revised local development plans with the objective to enhance the economic and environmental resilience of communities (e.g. through reforestation, rehabilitation of mangroves, terracing, and small water catchment). This shift towards an integrated social protection and DRM system marks an important step towards better coordination and more effective service delivery – a significant deficiency in the country as outlined in the CPS.

An important innovation under this operation is the provision of cash for work opportunities to selected families over a longer period of time (3 years) accompanied by orientation, training and practical support in developing the household's productive capacity (1 day per week). This safety net “plus” approach will need to be coordinated with local agencies such as micro-finance institutions and local Non-Governmental Organizations (NGO) that offer complementary services. Finally, the project intends to address malnutrition through simultaneous demand and supply side interventions: The cash for work activities will provide the poorest families with cash income, and the community nutrition activities will enhance the knowledge and practices needed to address malnutrition of children.

### Project components

Component 1. Establishment of a safety net (US\$3.8 million). The component would include two key elements of an effective safety net. It would build the institutional and operational foundations to provide a longer term safety net for the poorest households in selected communities through productive cash for work activities over a three year period for the selected households. After this period, the households would be expected to continue to benefit from the productive activities. In addition, the component includes a short term safety net for disaster affected households and communities that would provide quick recovery support to selected households and communities.

#### Subcomponent 1.1: Establishment of a Productive Safety Net (US\$3 million)

This component would provide cash to targeted poor families in exchange for their participation in

community work activities. It would build on long-term FADC's proven experience in implementing cash-for-work activities. The "productive" safety net modality would offer periodic cash for work opportunities to the poorest families of selected communities over a three year period with the aim of smoothing their consumption and supporting them in developing productive activities. Targeting of poorest households would be done through a combination of geographical, community targeting and verification of community lists with a Proxy Means test (PMT). The geographical targeting is based on a distribution formula agreed between the island governments for the national budget. Thus, Grande Comore would receive 45 percent, Anjouan 42 percent, and Mohéli 12 percent of the safety net funds. The daily wage rate would be set at about KMF 1000 (approximately United States Dollars (USD) 2.7) per day for 5 hours of work to enhance self-targeting. The program would offer two work periods of 30 days each per year, one before school starts (to promote school enrollment and attendance) and one six months later, aligned with the local "lean" season.

The Cash-for-work subprojects would focus on activities that have an impact on communities and households' productive capacity and positive environmental and social impacts as well as resilience to natural disaster and climatic events (e.g. reforestation, water management, terracing, etc.). Subprojects costs will reflect the labor-intensive nature of the activities: 75 percent of the costs would be cash benefits for the participating households, and the other 25 percent would be used for supervision, purchase of small equipment and materials, as well as for beneficiary training activities. Local NGO would be contracted by FADC to carry out these activities. They would, in particular, ensure the quality of the works, monitor the attendance and effective participation of the workers, carry out procurement of small equipment and materials, ensure compliance with work safety rules and environmental and social safeguards, and deliver/coordinate the training sessions to the selected households..

The productive safety net program will introduce training sessions for participants over the period of three years. Training and capacity building activities would focus on families' productive capacity and means, and range from financial literacy to guidance on the development of productive activities. These activities will be locally coordinated with existing organizations (e.g. micro-finance).

Subcomponent 1.2. Protecting vulnerable households and communities from devastating effects of disasters (US\$800,000)

This component would finance activities to support communities and households in the immediate aftermath of natural disasters. Over the past several years, FADC has supported many of the poorest communities in preparing their local development plans (Plan de Développement Local or PDL). The component would support communities in updating their PDL to reflect DRM and social protection activities through cash for work.

The component would finance the repair and rehabilitation of small village infrastructure damaged by natural disasters, or proposed in their PDL for those communities which have not yet benefited from community subproject. FADC would sub-contract private construction companies to carry out the works. Based on the results of a recent Technical Audit of all infrastructure projects implemented under the Emergency Crisis Response Project, FADC is presently reviewing its procedures and standards to improve the technical quality of the community infrastructure subprojects, their resilience to disasters, and their maintenance by the communities. The improvements will be reflected in a revised operational manual which will be submitted for no objection to the Bank prior to project effectiveness.

The component would also finance emergency cash-for-works activities in the immediate aftermath of natural disasters. FADC would collaborate with the Direction Générale de la Sécurité Civile (DGSC), the government agency in charge of Disaster Risk management in cases where a national emergency is declared. To ensure smooth collaboration and clarity of roles and responsibilities, FADC would sign a Memorandum of Understanding with the DGSC prior to effectiveness.

37. Beneficiary households would be selected from the poor households that have been impacted by the natural disaster. Targeting would be managed by the DGSC and would therefore vary from that used by the productive safety net. The list of localities and of affected households will be compiled by the DGSC and forwarded to FADC. FADC will contract local NGOs to carry out the cash for work activities. Post-disaster public works activities may vary according to the impact of the disaster but would mostly focus on restoring village services and productive capacity, and would include clearing of debris, removal of sand, clearing of roads etc. Benefits paid to participants under this component would be different from that offered through the seasonal Safety Net. While the daily wage rate would be the same, the number of working days would be limited to 25. Selected households would participate only once per disaster in the program

Component 2. Improving the nutrition of young children from poor families (US\$1 million). The project would establish community nutrition activities to promote better nutrition for young children and their mothers. The proposed design is modeled after the successful and cost-effective community nutrition program in Madagascar, at the heart of which lies nutritional counseling to change behavior. This component will include nutrition interventions focused on children from 0-5 years of age in the same communities where the social safety net activities take place, and will establish community run nutrition sites.. It would focus on ensuring the delivery of a minimum package of nutrition-specific interventions to children under-five years of age, with particular focus on the “first thousand days” window of opportunity (from pregnancy to two years of age). This component would include support at the community level to establish nutrition sites (and related supervisory and monitoring structures at district level) to deliver a defined set of priority nutrition interventions focused on children 0-2 years of age (see Table 1). The community nutrition sites will use growth monitoring as an entry point for nutritional counseling and targeted supplementary feeding for children under 24 months. More specifically, activities will include: (i) training of Community Nutrition Promoters (CNPs), (ii) support for children up to 24 months through monthly weight and bimonthly height monitoring of young children, culinary demonstrations, counseling in Infant and Young Child feeding practice, health and hygiene information, and (ii) support to children ages 2-5 by tracking their height, weight and arm perimeter measurements quarterly, and referrals of severely malnourished children to health facilities. The CPNs would make home visits (mother-to-mother support) to create an environment that would enable mothers and caregivers to implement optimal nutritional practices for infants and young children, and to facilitate the translation of the income supplement from the cash for work into improved nutritional status.

Component 3: Strengthening Safety Net Management, Coordination, Monitoring and Evaluation (M&E). This component would strengthen institutional capacity to build key elements of a safety net system. It would support the establishment of an effective Management Information System (MIS) including a beneficiary registry. Furthermore, the component would support the establishment of a solid targeting system. This would include the design and testing of a Proxy Means Test that could be used in combination with geographical and community targeting. While the community representatives would prepare a long list of potential beneficiaries comprising the poorest households, the PMT would validate the pre-selection and ensure that all preselected households are indeed among the poorest. The component would also establish more efficient payment systems to

transfer cash to the safety net beneficiaries. This would include the contracting of a payment agency (or various payment agencies depending of service availability), and a system that would minimize paper-based transactions, as well as fraud and errors.

The project would also finance the operational costs associated with project administration, M&E and capacity building of FADC and implementing partners (NGOs, local firms), financial and technical audits and the evaluation of the project. Strong monitoring and evaluation arrangements would be introduced including ownership, social accountability and grievance redress mechanisms that would enable communities and other stakeholders to adequately report on program performance, particularly related to targeting, implementation of the cash for work activities, and payments. A process evaluation of the productive safety net activities would be included as well as an ex-post evaluation for components 1 and 2. Finally, this component would include the necessary technical assistance and administrative arrangements for implementing the community nutrition program.

#### **D. Project location and salient physical characteristics relevant to the safeguard analysis (if known)**

Nationwide involving all three Islands of Comoros.

#### **E. Borrowers Institutional Capacity for Safeguard Policies**

FADC has a good track record of complying with social and environmental safeguards. More than 50 percent of beneficiaries are female, youth groups are extremely dynamic in project activities, and this is also reflected in FADC staff. Overtime, the institution has been trained in social and environmental safeguards and has had no major issues so far, rather, it has grounded a strong social and environmental know-how that is a clear usage of the social and environmental clauses included in contractors contracts. Communities awareness on HIV/AIDS and STI has also gained a strong success. The regional directorates had been leading the awareness raising campaign through the involvement of district health/sanitary services. Building upon such experience, the project aims at further supporting this endeavor by streamlining the sensitization efforts (and possibly the screening) for the project selected communities also part of the National HIV/AIDS Program. Furthermore, FADC is implementing less infrastructure projects, and more cash transfers which tend to have less negative social and environmental impacts. To the contrary, the project is expected to foster a blooming positive social impact on the beneficiary communities, especially women, youth, the poor and most vulnerable groups since the cash for work activities are meant to rather safeguard both the natural and physical environment and prevent or minimize the effects of climate change on communities.

#### **F. Environmental and Social Safeguards Specialists on the Team**

Cheikh A. T. Sagna (GSURR)

Paul-Jean Feno (GENDR)

## **II. SAFEGUARD POLICIES THAT MIGHT APPLY**

<b>Safeguard Policies</b>	<b>Triggered?</b>	<b>Explanation (Optional)</b>
Environmental Assessment OP/ BP 4.01	Yes	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

	<p>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 environmental assessment policy (OP/BP 4.01) suggests that the Borrower prepares an Environmental and Social Management Framework (ESMF). This framework sets forth the basic principles and procedures/directives to be followed by both the Borrower and the World Bank once the physical locations of the proposed activities are known. Since this project builds pretty much on its parent project, it will therefore build upon the ESMF prepared by the ongoing World Bank funded operations in the current FADC. The ESMF would provide an Environmental and Social Screening Form (ESSF) to be applied for each proposed subproject and likewise provide simple guidelines to adequately mitigate (avoid, minimize or reduce) any environmental and social impacts from financed subprojects. The ESMF will provide a basic description of the natural and physical environment of the targeted project intervention zones, and include an institutional arrangement that clarifies the specific role and responsibilities of government agencies and the implementation unit team,</p>
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		including the World Bank; an environmental and social management Plan (ESMP) that includes a detailed capacity building action plan; a public consultation and participation that details ways stakeholders, including women, youth and vulnerable groups have been consulted upon and their concerns captured in the project design; a grievance redress mechanism that provides clearer guidance on how possible grievances will be handled throughout the project life cycle; a monitoring and evaluation mechanism; and, an estimated budget. Once completed, the ESMF will be reviewed by the project social and environmental safeguards team and ultimately cleared by the World Bank and disclosed both in-country and at the Infoshop prior to appraisal.
Natural Habitats OP/BP 4.04	No	The project does not involve or affect natural habitats.
Forests OP/BP 4.36	No	The project does not involve forests or forestry.
Pest Management OP 4.09	No	The project does not involve pest management.
Physical Cultural Resources OP/BP 4.11	No	The project does not involve or affect physical cultural resources.
Indigenous Peoples OP/BP 4.10	No	There are no Indigenous Peoples in the project area.
Involuntary Resettlement OP/BP 4.12	No	The project does not involve land acquisition leading to involuntary resettlement and/or restrictions of access to resources or livelihoods.
Safety of Dams OP/BP 4.37	No	N/A
Projects on International Waterways OP/BP 7.50	No	N/A
Projects in Disputed Areas OP/BP 7.60	No	N/A

### III. SAFEGUARD PREPARATION PLAN

**A. Tentative target date for preparing the PAD Stage ISDS: 31-Oct-2014**

**B. Time frame for launching and completing the safeguard-related studies that may be needed.**

**The specific studies and their timing<sup>1</sup> should be specified in the PAD-stage ISDS:**

As per World Bank safeguard policy on Environmental Assessment (OP/BP 4.01) guidance, the proposed project is been classified as a Category B project due to the site specific nature of its foreseen potential social and environmental impacts, which are easily manageable. As stated above, since the location of the sub-projects to be financed is not yet known at this very juncture, the borrower will prepare an Environmental and Social Management Framework (ESMF) from the

<sup>1</sup> Reminder: The Bank's Disclosure Policy requires that safeguard-related documents be disclosed before appraisal (i) at the InfoShop and (ii) in country, at publicly accessible locations and in a form and language that are accessible to potentially affected persons.

existing one of the FADC. Once cleared, the ESMF will be publicly disclosed both in-country and at the Infoshop prior to appraisal.

#### IV. APPROVALS

Task Team Leader:	Name: Andrea Vermehren	
<b><i>Approved By:</i></b>		
Regional Safeguards Coordinator:	Name: Alexandra C. Bezeredi (RSA)	Date: 07-Dec-2014
Practice Manager/ Manager:	Name: Manuel Salazar (PMGR)	Date: 08-Dec-2014