

**INTEGRATED SAFEGUARDS DATA SHEET
APPRAISAL STAGE**

Report No.: ISDSA1097

Date ISDS Prepared/Updated: 06-Jan-2015

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I. BASIC INFORMATION

1. Basic Project Data

Country:	Comoros	Project ID:	P150754
Project Name:	Comoros Social Safety Net Project (P150754)		
Task Team Leader(s):	Andrea Vermehren		
Estimated Appraisal Date:	16-Jan-2015	Estimated Board Date:	17-Mar-2015
Managing Unit:	GSPDR	Lending Instrument:	Investment Project Financing
Sector(s):	Other social services (80%), Health (20%)		
Theme(s):	Natural disaster management (20%), Social safety nets (50%), Nutrition and food security (20%), Other rural development (10%)		
Is this project processed under OP 8.50 (Emergency Recovery) or OP 8.00 (Rapid Response to Crises and Emergencies)?			No
Financing (In USD Million)			
Total Project Cost:	6.00	Total Bank Financing:	6.00
Financing Gap:	0.00		
Financing Source			Amount
BORROWER/RECIPIENT			0.00
IDA Grant			6.00
Total			6.00
Environmental Category:	B - Partial Assessment		
Is this a Repeater project?	No		

2. Project Development Objective(s)

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

3. 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 and mothers.

Project components

Component 1. Establishment of a Productive and Disaster Responsive Safety Net (US\$4 million)

The component would support the implementation of two key elements of an effective safety net. It would (i) build the institutional and operational foundations for a longer term safety net for the poorest households in selected communities through productive cash for work activities over a three year period. After this period, the households would be expected to continue to benefit from the productive activities; and (ii) make available a short-term safety net for disaster affected households and communities by providing quick recovery support to selected households and communities.

Subcomponent 1.1: Establishment of a Productive Safety Net (US\$3.2 million). This sub-component would provide cash to targeted poor families in exchange for their participation in cash for work

activities. It would build on FADC's 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 and community targeting, enhanced by a daily wage rate below the working daily wage. The cash-for-work sub-projects would focus on activities that have an impact on communities and households' productive capacity and positive environmental impact as well as resilience to natural and climatic events (e.g. reforestation, water management, terracing. etc.). In addition, the sub-component would finance small community infrastructure sub-projects that complement the cash-for-work activities with the objective of improving the productive basis of the area, but which are too big and complex to be carried out through cash for work. This would include sub-projects like small-scale water supply and sanitation, water retention systems, feeder roads etc. that are necessary to support the implementation of the larger area development. The sub-projects would be selected based on community demands and prioritized based on their biggest impact with regard to the overall area development plan. In order to qualify for Project financing, sub-projects must cost less than US\$85,000 and would be implemented in accordance with FADC's Operational Manual for Small Infrastructure. For implementation, services would be contracted for sub-project planning/design, construction and supervision. Maintenance of the sub-project would be prepared by providing training to a community committee, and would be monitored closely during Project implementation.

Subcomponent 1.2 Early Recovery Response to Natural Disasters (US\$0.8 million): This subcomponent would finance activities to support communities and households in the immediate aftermath of natural disasters. It would support communities in updating their local development plans to reflect disaster risk management (DRM), and social protection activities in the aftermath of disasters through cash for work. The subcomponent would be implemented by FADC in close collaboration with the General Department of Civil Security (Direction Générale de la Sécurité Civile, DGSC) - the government agency in charge of DRM in cases where a national emergency is declared. The sub-component would also finance the rehabilitation and reconstruction of small village infrastructure damaged by natural disasters, and emergency cash-for-work activities for cleaning up and repair.

Component 2. Improving the nutrition of young children and mothers from poor communities (US\$1 million).

This component would provide preventive nutrition services for the same poor communities to help households get out of the inter-generational cycle of poverty. The specific objective of this component is to promote, at the community level, the adoption of appropriate Infant and Young Children Feeding (IYCF) practices by households. It would focus on ensuring the delivery and demand creation of a minimum package of nutrition-specific interventions for children under five years of age, with particular focus on the "first thousand days" window of opportunity (from pregnancy to two years of age). It would also promote better nutrition and reproductive health for mothers. The design is partially modelled after the successful and cost-effective National Community Nutrition program in Madagascar and Bangladesh's Rural Advancement Committee (BRAC) approach, at the heart of which lies nutrition counseling to change behavior. Three types of behavior would be promoted, which are in line with the document on Essential Family Practices of Comoros, namely: (i) Exclusive Breast feeding (EB); (ii) food diversification (in quantity and quality); and (iii) hand washing before meals (HW). UNICEF would assist the Government in implementing this component given UNICEF's unique and strong capacity in the sector.

Component 3: Strengthening Safety Net Management, Coordination, Monitoring and Evaluation (US \$1 million)

This component aims at supporting the development of key elements of a safety net system. It would support the establishment of an effective Management Information System (MIS) including a beneficiary registry based on geographical and community targeting to provide accurate data on beneficiaries and program implementation at all times. The component would also help establish payment systems to transfer cash to the safety net beneficiaries through micro-finance institutions, where possible. This would include the contracting of a payment agency (or various payment agencies depending on service availability), and a payment system that would minimize paper-based transactions, as well as fraud and errors. Coordination activities among key stakeholders involved in project implementation would also be supported under the component. The component would also finance the operational costs associated with project administration, monitoring and evaluation, communication and information, and technical assistance required for project implementation.

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

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

5. Environmental and Social Safeguards Specialists

Cheikh A. T. Sagna (GSURR)

Paul-Jean Feno (GENDR)

6. Safeguard Policies	Triggered?	Explanation (Optional)
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 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. Since the physical locations of the proposed project activities to be repaired and/or rehabilitated are unknown at this stage, the Borrower has prepared an

		Environmental and Social Management Framework (ESMF) that was consulted upon and cleared by the World Bank. It will be publicly disclosed both in-country and at the InfoShop prior to appraisal.
Natural Habitats OP/BP 4.04	No	
Forests OP/BP 4.36	No	
Pest Management OP 4.09	No	
Physical Cultural Resources OP/BP 4.11	No	
Indigenous Peoples OP/BP 4.10	No	
Involuntary Resettlement OP/BP 4.12	Yes	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 prepared a 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 RPF has articulated monitoring and evaluation with clear

		delineations of monitoring indicators and the responsibilities of agencies. The RPF was consulted upon, reviewed and cleared by the World Bank for public disclosure, both in-country and at the InfoShop prior to project appraisal.
Safety of Dams OP/BP 4.37	No	
Projects on International Waterways OP/BP 7.50	No	
Projects in Disputed Areas OP/BP 7.60	No	

II. Key Safeguard Policy Issues and Their Management

A. Summary of Key Safeguard Issues

<p>1. Describe any safeguard issues and impacts associated with the proposed project. Identify and describe any potential large scale, significant and/or irreversible impacts:</p> <p>The proposed project will finance key civil works activities, namely repair and/or rehabilitation of small scale village infrastructure damaged by natural disasters. Likely adverse impacts include air, soil and water pollution, loss of vegetation, soil erosion, traffic accidents, and potential loss of livelihoods and/or land required for future infrastructure investments. 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, or cause damage to the existing physical and social environment. The proposed activities/sub-projects 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.</p>
<p>2. Describe any potential indirect and/or long term impacts due to anticipated future activities in the project area:</p> <p>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 FADC 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.</p>
<p>3. Describe any project alternatives (if relevant) considered to help avoid or minimize adverse impacts.</p> <p>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.</p>
<p>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.</p> <p>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</p>

project, the Borrower has prepared: (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.

At the project level, the FADC has extensive experience in implementing IDA operations as noted with the ongoing Comoros Emergency Crisis Response Project. The FADC 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 FADC has extensive experience engaging public consultations and also in the Bank's disclosure policy. During the implementation of the proposed project, the FADC will initiate the public consultations as early as possible and will provide all relevant materials in a form and language(s) acceptable and accessible to all beneficiaries involved. The ESMF and RPF have been publicly disclosed in the country and in the Infoshop.

B. Disclosure Requirements

Environmental Assessment/Audit/Management Plan/Other	
Date of receipt by the Bank	17-Nov-2014
Date of submission to InfoShop	10-Dec-2014
For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors	
"In country" Disclosure	
Comoros	05-Dec-2014
<i>Comments:</i> in rather final draft version	
Resettlement Action Plan/Framework/Policy Process	

Date of receipt by the Bank	20-Nov-2014
Date of submission to InfoShop	10-Dec-2014
"In country" Disclosure	
Comoros	05-Dec-2014
<i>Comments:</i> In rather final draft version	
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

OP/BP/GP 4.01 - Environment Assessment	
Does the project require a stand-alone EA (including EMP) report?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
If yes, then did the Regional Environment Unit or Practice Manager (PM) review and approve the EA report?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
Are the cost and the accountabilities for the EMP incorporated in the credit/loan?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
OP/BP 4.12 - Involuntary Resettlement	
Has a resettlement plan/abbreviated plan/policy framework/process framework (as appropriate) been prepared?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
If yes, then did the Regional unit responsible for safeguards or Practice Manager review the plan?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
The World Bank Policy on Disclosure of Information	
Have relevant safeguard policies documents been sent to the World Bank's Infoshop?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
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 [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
All Safeguard Policies	
Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
Have costs related to safeguard policy measures been included in the project cost?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]

III. APPROVALS

Task Team Leader(s):	Name: Andrea Vermehren	
<i>Approved By</i>		
Practice Manager/ Manager:	Name: Peter Ivanov Pojarski (PMGR)	Date: 08-Jan-2015