Appraisal Environmental and Social Review Summary

Appraisal Stage

(ESRS Appraisal Stage)

Date Prepared/Updated: 11/11/2019 | Report No: ESRSA00332

BASIC INFORMATION

A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
Comoros	AFRICA	P171361	
Project Name	Comoros Post-Kenneth Recovery and Resilience Project		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Urban, Resilience and Land	Investment Project Financing	11/4/2019	12/16/2019
Borrower(s)	Implementing Agency(ies)		
Ministry of Finance, Budget and Banking Sector.	Directorate General for Civil Security (DGSC)/Center for Relief Operations and Civil Protection (COS, Ministry of Land-Use and Urban Planning, in charge of Land issues and Land Transport		

Proposed Development Objective(s)

The Project Development Objective is to support recovery and increase disaster and climate resilience of select public and private infrastructure in the areas affected by cyclone Kenneth.

Financing (in USD Million)	Amount
Total Project Cost	45.00

B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?

Yes

C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]

The proposed Project addresses part of the reconstruction needs in the housing and infrastructure sector with the aim to strengthen long term resilience of the affected areas against natural and climate related disasters. In addition, the project will strengthen DRM capacities. The proposed interventions support the priority sectors identified in the

post-Kenneth Impact Evaluation and Recovery and Reconstruction Plan (June 2019) that received limited pledges or that no other ongoing development programs can immediately address, and where the World Bank has added-value. It would particularly support: (1) recovery and resilience in the housing sector, (2) infrastructure rehabilitation and coastal protection, and (3) integrated DRM. The project will support interventions in areas affected by Cyclone Kenneth across the three islands.

D. Environmental and Social Overview

D.1. Project location(s) and salient characteristics relevant to the ES assessment [geographic, environmental, social]

The Union of Comoros (UoC), a small volcanic archipelago in the Indian Ocean, is located at the northern end of Mozambique and north-weste of Madagascar. With about 1,800 square kilometers of land and 340 kilometers of coastline, the UoC is home to one of the most diverse coral reefs in the world. UoC is mainly composed of three islands: Ngazidja (Grande Comore), Mwali (Moheli), and Nzwani (Anjouan). Among the approximately 800,000 population, half live on Ngazidja (or Grande Comore), which is the largest island where the capital city Moroni is located. The population is growing rapidly (2.9 percent a year) and is forecasted to reach 1 million by 2028 and to more than double by 2050.

The project is being prepared in a Situation of Urgent Need of Assistance. Tropical Cyclone Kenneth hit the Comoros Islands with force on April 24th, 2019 causing significant damage to agriculture and already degraded public and private infrastructure. More than 40 percent of the population was affected, with damages and losses amounting to US$185 million and an estimated US$277 million of total cost for recovery and reconstruction. The strong winds, torrential rains and high waves destroyed houses, crops, businesses and core infrastructure. A total of 345,131 people across the three islands were affected, 153 people were injured, 11,969 people were displaced, and 7 casualties were reported.

The government of the UoC has requested the Bank support to address several of the urgent infrastructure, humanitarian and policy, institutional and legal framework activities required to address the economic, environmental and social damages caused by the passage of Cyclone Kenneth. As a small island developing state (SIDS), the UoC faces related usual constraints as highly concentrated markets, large trade and services deficit, and high costs of living. In addition, despite the government's commitment to adopt measures to face the infrastructure, socioeconomic and environmental emergency generated by the cyclone, the UoC remains a politically fragile country with formal institutions requiring further strengthening.

The project will be implemented at the national level in both rural and urban areas. Project planning must take into consideration the country's challenging economic geography. The UoC is a small state, where remoteness and accessibility are a challenge. The project will support interventions in areas affected by Cyclone Kenneth across the three islands. The project will construct or rehabilitate several of the infrastructure damaged by the heavy rains and strong winds from Cyclone Kenneth, including critical public infrastructures, like roads or dikes, and private homes. Project activity targeting houses' construction or rehabilitation will be implemented in conjunction with strengthening of the institutional, legislative and regulatory sector framework of housing and construction, land-use planning, and urban planning to reduce vulnerability and improve resilience.

The project components that are expected to generate environmental and social risks and impacts are: (i) Support to housing reconstruction/rehabilitation by the financing of partial or complete reconstruction of approximately 1,000

housing units for an estimated 5,400 affected houses; and (ii) Infrastructure Rehabilitation and Coastal Resilience mainly rehabilitation of existing road on the damaged section on an estimated 14 km of primary roads and coastal protection infrastructures on 3 km.

D. 2. Borrower's Institutional Capacity

UoC has some experience from implementing World Bank Operational Policies but does not have experience from applying the new ESF. The Ministry of Territorial and Urban Planning, Land Issues and Land Transport (MTPUP) will be the dedicated Project Implementation Unit (PIU) and will lead technical supervision of activities. The PIU will be established within the Directorate General of Equipment and Territorial Planning (DGEAT) and working closely with the other Directorate General responsible for Roads and Land Transport (DGRTR). The DRM sub-component will be implemented in close collaboration with DGSC/COSEP which may require a co-execution subsidiary agreement to guarantee effective coordination and collaboration. The project will coordinate with the Ministry of Environment for all environmental permit issues and specific coordination possibly on coastal management issues and climate change data.

The project technical assistance will establish an environmental and social risk management team within the PIU that will be composed of one environmental specialist and one social development specialist. The team will be in charge of all social and environmental management procedures related to the reconstruction and rehabilitation works, including the integration of environmental and social mitigation measures in the bidding documents of all planned civil works, and supervision and monitoring of social and environmental risk management activities. The E&S team will oversee the preparation of the environmental and social instruments to be elaborated during implementation. In addition, community liaison officers will be mobilized at the local level to support the implementation and monitoring of the stakeholder engagement plan. Any capacity gaps/strengthening measures will be captured in the environmental and social assessment and reflected in the Environmental and Social Commitment Plan (ESCP).

Though the Government of the UoC is committed with successful project implementation, weak or nonexistent environmental and social data and risk management capacities in certain areas remain a central concern. Though impacts on the human environment are contemplated under Comorian environmental impact assessment legislation, the diverse resettlement, gender, and human and community health and safety aspects, among others, embraced by the ESF are still not similarly developed in the national legal and institutional impact assessment framework.

In addition, overall institutional capacities are not robust, and decentralization is not progressing as expected. This weak governance scenario may pose an additional layer of difficulty when implementing activities, particularly outside of Grande Comores where the capital city of Moroni is located.

Significant efforts will be required to build the UoC capacity to be able to manage the increased social and environmental remit of the ESF. The capacity assessment conducted as part of the Bank's appraisal mission highlights the need to strengthen environmental and social risk management capacities to ensure appropriate implementation of the ESF.

The Bank may consider entering into arrangements with specialized agencies of the United Nations System and other international NGOs for specific technical assistance.

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

A. Environmental and Social Risk Classification (ESRC)

Substantial

Environmental Risk Rating Substantial

The environmental risk rating (ERR) of the project is considered Moderate under the ESF in consideration of the nature and scale of the proposed rehabilitation/reconstruction works. Anticipated environmental implications of rehabilitation of housing and infrastructure standards and practice are limited. The potential impacts of the rehabilitation of existing national roads of an estimated 14 km; and Coastal protection infrastructure of 3 km on damaged sections are mostly low to moderate risk, as this component will provide mainly civil works with temporary impacts and on short damaged sections. The reconstruction of housing will encompass mainly small works. These impacts are expected to be limited, site-specific and temporary and can be effectively minimized and/or mitigated with the adoption of proper environmental and social impact management procedures. Despite the environmental risk and impact being assessed as moderate risk, the ERR is considered Substantial due to the weak capacity of the implementing agency in managing environmental risks and impacts.

Social Risk Rating Substantial

Overall, the project is expected to contribute to positive social impacts such as improved housing and social infrastructure, enhanced connectivity and road safety, disaster preparedness and temporary employment opportunities. However, the project components are likely to induce adverse social risks and impacts that are mostly temporary, predictable and/or reversible and known mitigation measures are readily available. Nevertheless, there are concerns that the adverse social impacts of the Project, may give rise to a limited degree of social conflict possibly due to the beneficiary selection and land rights registration. Furthermore, some risks and impacts may be significant such as physical and economic displacement impacts mainly from the planned infrastructure activities of component 2 and land ownership issues. The risks that have been identified during the preliminary screening are the following: ESS1 weak capacity of the client to assess and manage social risks; ESS10 possible risks of nepotism and exclusion of marginalized groups in project design, beneficiary selection criteria and undertaking of consultations that result in manipulated or one sided outcomes; ESS2 generated by roads and other infrastructure construction or rehabilitation likely to be substantial due to the size of the civil works; ESS4 such as potential risks of Gender Based Violence (GBV) and Sexual Exploitation and Abuse (SEA) and spread of infectious diseases as well as road safety; ESS5 the project will likely involve temporary and possibly permanent displacement impacts as well as impacts on livelihoods through the road rehabilitation and coastal protection activities. Furthermore, in line with the WB GBV Good Practice Note the Bank has undertaken a GBV risks screening of potential risks and impacts induced by the project and the GBV risk has been rated as Moderate. Moreover, as already indicated, the Client capacities and institutional and legal framework on social risk management and the variety of issues covered under this ESF stream do not yet duly respond to ESF requirements. Accordingly, the project social risk has been classified as substantial due to the the social risks and impacts identified above, including the absence of technical studies coupled with the weak institutional capacity and emergency nature of the operation.

B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:

The project is expected to result in direct and indirect environmental and social risks and impacts which will required further specialized assessments and management of environmental and social risks and impacts.

Risks and impacts that have been identified during the preliminary environmental and social risk screening conducted by the Bank team during the appraisal mission are: ESS1 weak capacity of the client to assess and manage environmental and social risks and impacts, labor influx and increased employment expectations; ESS10 possible risks of excluding marginalized groups in project design, beneficiary selection criteria and consultations, and undertaking of consultations that result in manipulated or one sided outcomes; ESS2 generated by roads and other infrastructure construction or rehabilitation likely to be substantial due to the size of the civil works (approx. 200 workers per site); ESS4 such as potential risks of Gender Based Violence (GBV) and Sexual Exploitation and Abuse (SEA), spread of infectious diseases, road safety and accidents induced by works; ESS5 the project will likely involve temporary and possibly permanent relocation impacts as well as impacts on livelihoods through the road rehabilitation and coastal protection activities; risks and impacts related to ESS6 may be expected as the project comprises diverse infrastructure construction works that may interfere with natural habitats. Similarly, risks and impacts related to ESS8 may be expected as the civil works may result in chance find discoveries through excavation works. ESS7 and ESS9 have been assessed as currently not relevant.

The activities to be funded by the project that could generate environmental and social risks and impacts that can be aggregated into three sets, with distinct environmental and social implications: (i) reconstruction of housing and public infrastructure assets (small construction works), (ii) the rehabilitation of damaged road sections on an estimated 14 km of primary national roads ; and (iii) the reconstruction of a total of 3 km of the coastal protection infrastructures.

Component 1: The Reconstruction of Housing (Small works) aims to repair and reconstruct approximately 1000 housing units. The potential environmental and social impacts and risks are expected to be localized and temporary, caused, mainly by the construction activities. Construction solid waste generation and noise pollution may be relevant impacts as well as occupational and community health and safety and labor conditions due to the construction activities, land requirements, if any, are expected to be of a temporary and/or small-scale nature. There is also a potential risk of social conflict due to sensitivities concerning the selection criteria and possible perception of unfair treatment as well as land dispute due to the lack of formal land registration and titles. It is critical that the beneficiary selection criteria is undertaken in a socially inclusive, transparent and conflict-sensitive manner to ensure that elite capture does not take place and selection of sub-projects is undertaken with stakeholder consultation and inclusion. It will also be important to ensure that land ownership is verified and that appropriate land agreements are put in place to avoid future disputes.

Component 2: the rehabilitation of an estimated 14 km of primary road that aims to repair and rehabilitate the road section damaged by the cyclone. The road sections are based on existing roads with a pre-established right-of-way and in some cases may pass through villages. The potential environmental and social impacts and risks are expected to be localized and mainly temporary with some permanent impacts during the civil works activities. Waste generation, noise and air pollution as well as occupational health and safety, labor conditions and community health and safety are some of the potential risks identified that will be included in the contractor ESMPs. These activities are

also likely to induce physical and economic displacement impacts as well as potential impacts on livelihoods, the details of these likely impacts will be identified in the RF and RP documents.

The reconstruction of a total of 3 km of the coastal protection infrastructures aims to reduce coastal erosion and slop stabilizing, the rehabilitation and strengthening of the coastal protection. The potential environmental impacts and risks are expected to be site specific and temporary, caused mainly by the construction activities. Waste generation, noise and air pollution may be relevant impacts as well as occupational health and safety and labor conditions and community health and safety, adequate mitigation measures will be included in the site specific ESMPs. This component may also lead to some small-scale land acquisition and some impact on livelihoods. However, most of the land requirements are expected to be of a temporary and/or small-scale nature with permanent displacement for some households and small businesses.

Component 3: Integrated disaster risk management. These activities are mainly technical assistance and capacity building activities and are therefore not expected to generate any adverse environmental and social risks and impacts. The limited risks and impacts may concern labor and working conditions where ESS2 would apply to the consultants hired to provide technical assistance as well as risks of poorly conducted consultations and engagements as well as information dissemination to stakeholders, especially at the community level, for relevant technical studies. The CERC sub-component will remain dormant until formal activation is initiated and as such no current E&S risks and impacts are anticipated, however, the ESMF and other relevant instruments as described in the ESCP would apply in the event that the CERC were activated.

Environmental and Social Assessment (ESA): As the exact project locations will not be clearly defined during the project preparation phase, an Environmental and Social Management Framework (ESMF) has been deemed as the most appropriate environmental and social risks assessment instrument for the project preparation. The ESMF will define the methodology and procedure for conducting environmental and social screening once the different infrastructure locations are defined. Site-specific Environmental and Social Assessments will be carried out in line with the requirements of the World Bank Environmental and Social Framework (ESF) and national laws and regulations . The ESMF instrument will clearly define mitigation measures for construction and operational phases, measures to manage environmental and social impacts, occupational and community health and safety, for the construction works, including preparation of specific E&S instruments for the rehabilitation of national roads, segments and coastal protection infrastructures. It will also include procedures on labor management and camp management where construction work may require that these are established, roles, and responsibilities, time and costs for each mitigation measures recommended. The ESMF will be finalized, adopted and disclosed four (4) weeks after project effectiveness. The preparation of the ESIAs/ESMPs will be initiated upon the conclusion of the feasibility studies and preliminary engineering designs and will be submitted for Bank's review and clearance before launching the bidding process. The approved ESMP with the E&S clauses will be included in the civil works Bidding Documents and Enterprises contracts to allow the latter to prepare the specific contractor ESMP before to commencement of civil works.

Cumulative Impacts: As the operation aims to recover and reconstruct the damaged infrastructures and housing after cyclone Kenneth, the selected activities and components could not generate any cumulative impacts with the geographic re-partition in the three Islands and the small to medium size of project activities.

Management/Mitigation
From the preliminary review carried out at the appraisal stage, it can be concluded that the Client environmental and social management system (ESMS) needs to be enhanced to comply with ESF requirements. The project will address the identified gaps in the ESCP that has been prepared during the pre-appraisal mission and discussed with the Ministry of Territorial and Urban Planning, Land Issues and Land Transport.
As the technical studies have not yet been completed for the infrastructure components of the project, the extent of land required is not clear at this stage. Screening and assessment of social impacts will need to be undertaken during feasibility studies to identify the exact extent of land needs and resettlement impacts. As such, the RF will be developed and will guide the preparation of a site-specific Resettlement Plans. The RF will establish resettlement principles, organizational arrangements, and design criteria to be applied to sub-projects or project components requiring land acquisition to be prepared during project implementation. Once the sub-project or individual project components are defined and the necessary information becomes available, such a framework will be expanded into a specific plan proportionate to potential risks and impacts.

Land use planning frameworks and a housing committee will also be established in order to mitigate and manage land security issues. Further details may be found in the PAD. A SEP has been developed in order to systematically plan stakeholder engagement activities and ensure meaningful, inclusive and transparent consultations. For the management of contractors, construction contracts will be required and inclusion of ESHS measures will be included in the bidding documents. A GBV Action Plan will also be developed and implemented by the Project.

ESS10 Stakeholder Engagement and Information Disclosure

Stakeholder engagement is a critical tool for social and environmental risk management, project sustainability and success, therefore, in consultation with the Bank, the client will prepare and implement an inclusive Stakeholder Engagement Plan (SEP) proportional to the nature and scale of the project and associated risks and impacts, which under the current project are substantial.

The appraisal stage screening allowed the identification of vulnerable groups, which include households led by single, separated, divorced, or widowed women; households led by divorced or widowed men; households led by the elderly; and households with people with disabilities or chronically ill. The update of vulnerable groups must be iterative throughout the design and implementation of the project so that exclusions and discrimination are updated where required, and appropriate measures adopted to ensure they have equal opportunities to express their concerns and opinions about the project.

A draft of the SEP has been developed prior to appraisal and will be disclosed upon approval by the WB. The SEP includes a Communication Plan with focus on, among others, housing committees and land registration, infrastructure rehabilitation and construction, and the grievance mechanism. As part of the SEP preparation the client has conducted several community meetings, consultations, focus group discussions and key informant interviews in the identified project locations since late September 2019. The summary of these meetings are captured in the SEP along with participants lists and pictures where Broad Community Support (BCS) has been provided. The client will continue to seek stakeholder feedback and opportunities for proposed future engagement, ensuring that all consultations are inclusive and accessible (both in format and location) and through channels that are suitable in the local context. If major changes are made to the SEP, a revised SEP should be publicly disclosed.

The borrower will engage in meaningful consultations with all stakeholders throughout the project life cycle paying particular attention to the inclusion of vulnerable and disadvantaged groups (including women, the elderly, persons with disabilities, female-headed households and orphans and vulnerable children). The Client will 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.

As part of the environmental and social assessment the borrower will maintain, and disclose, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not.

A Grievance Mechanism (GM) is also currently being prepared for the project, the GM will take into consideration existing local grievance structures and relevant stakeholders, including those considered vulnerable. The outline of the GM is provided in the draft SEP and will be further refined within 4 weeks of Board approval. The GM will be operational prior to commencement of any project activities. The Grievance Redress System (GRS) of the World Bank will also be applied.

B.2. Specific Risks and Impacts

A brief description of the potential environmental and social risks and impacts relevant to the Project.

ESS2 Labor and Working Conditions

The standard is assessed as currently relevant due to the expected substantial infrastructure work that will most likely require a significant amount of labor currently estimated at 200 workers per infrastructure site and an estimated 50 technical and administrative staff for the PIU and technical DRM component. Though the project will try to locally hire the workforce required to construct or rehabilitate the diverse civil works, in some contexts, as rural settings, short-term labor from outside of the locality (likely to be international but could also be national from other parts of the country) may be required and small labor camps are therefore anticipated. It is also likely that the project will require the use of security services, but this will be in limited numbers and around the project sites where equipment will be stored. Potential risks are those related to labor conditions (working hours, wages, etc.), Occupational Health and Safety and code of conduct of workers.

Management/Mitigation
The project will develop Labor Management Procedures (LMP) that will include a Code of Conduct which will include clear language on expected behavior of workers with community members as well as any punitive measures for non-compliance. A standalone OHS Management Plan and Labor Management Plan will be prepared by the contractors as well as a worker's grievance mechanism. A Labor Camp Management Plan will be required in the event of use of Labor Camps.

ESS3 Resource Efficiency and Pollution Prevention and Management

This standard is currently assessed as relevant, mainly due to the potential generation of hazardous and non-hazardous wastes in housing construction and rehabilitation of road and coastal protection infrastructures and the absence of waste management facilities in the country. There is a low probability of major threats to the protection of natural habitats and ecosystem services, as most construction areas have already been urbanized and/or degraded. Construction works also have the potential to generate significant amount of solid waste at construction and decommissioning sites, including excess fill materials from grading and excavation activities, scrap wood and metals, and small concrete spills. Hazardous solid waste could include contaminated soils, machinery maintenance materials, such as used oil filters, and used oil, as well as spill cleanup materials from oil and fuel spills. The UoC has currently weak capacity in waste management, there is no centralized waste collection and treatment system in UoC for solid waste and no licensed landfills or disposal facilities for either solid or hazardous waste.

Management/Mitigation
Techniques for assessing the characteristics of the material to be excavated in the rehabilitation civil works and preventing and controlling hazardous and non-hazardous wastes will be detailed in the ESMPs and Waste Management Plans (WMPs) of specific sub-projects. The sub-project WMPs will identify appropriate locations for disposal of sanitary, solid and construction waste through application of screening criteria provided in the ESMF; appropriate design, assessment and management of risks and impacts, e.g. siting away from sensitive habitats or communities, consideration of soil type, and measures to control runoff. All hazardous wastes on the islands are collected by the gas stations and transported off the island under Government control. Additional mitigation measures will be identified and included as part of the site specific ESMPs.

ESS4 Community Health and Safety

This standard is assessed as currently relevant due to the expected inflow of workers as a result of the project activities as well as through the specific project activities that will require civil works. Furthermore, it is expected that a limited number of security services will be used to secure the premises of the project. Experience indicates that the influx of workers and followers into a project area and their followers into the project area, as well as the presence of security personnel can lead to adverse social impacts such as gender-based violence, sexual exploitation and abuse, communicable diseases for local communities and additional pressure on the social infrastructure such as health centers, schools, water supply, etc., especially if the communities are rural, remote or small as they might be in some cases in this project. Furthermore, the project may result in increased human and vehicle accidents due to the project machinery, increase in vehicle movement on the roads and works during the construction phase.

The UoC has limited capacity on management of GBV/SEA risks. Although the UoC has a National Directorate General and a Commission for Solidarity and Gender Promotion (CGG) housed in the Ministry of Health, Solidarity and Gender, its organizational chart is not yet fully operational and a national action plan or work program for decentralized local structures on each island does not yet exist. Furthermore, the CGG lacks qualified and sufficient staff to perform the duties assigned to it. The country also has legislation on domestic violence, however, it is not duly enforced. Moreover, legislation on sexual harassment does not cover public places. UNICEF and UNFPA have supported the government in establishing a referral pathway for survivors, however, implementation challenges still persist, especially in the area of capacity (skills and availability of staff), protection of potential victims, as well as resources. The referral pathway will be further assessed during the elaboration of the GBV/SEA action plan.

Management/Mitigation
Housing construction and public infrastructure will be bench-marked to international standards and adapted to cyclone prone and seismic prone areas. For all the construction work, it will be stipulated in the ESMP that the contractor should install a security system around the project sites and equipment (fences and security guards if necessary) during the entire construction period. If the construction works are carried out on land owned by the Client, the contractor will use the existing security system if possible. When works take place on open roads, equipment and vehicles will be brought together to one single protected area during the night to ensure both community and worker's safety. The client and contractors will also be responsible for undertaking regular awareness raising to riparian communities on road safety and project site safety, such mitigation measures will be included in the ESMP. The contractor will also be responsible for implementing GBV/SEA mitigation measures that will be identified in the GBV/SEA Action Plan. The project will also conduct training's for the communities designed to heighten awareness of environmental and social risks and impacts and mitigation measures. Prior to engaging security personnel, the Project will be responsible to prepare, adopt, and implement a stand-alone Security Personnel Management Plan consistent with the requirements of ESS4.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

The standard is assessed as currently relevant as the project will entail the rehabilitation and construction of roads, dikes, and riverbank, coastal and drainage protection structures that is likely to result in permanent and temporary physical and economic displacement. When possible, these will be built on existing land owned by the Client or the local government. However, it is expected that the project may require formal, traditional or not recognized land or usufructuary rights acquisition. The breadth and variety of the infrastructure work foreseen by the project may involve medium to large scale physical and economic resettlement impacts, both temporary and permanent. As the technical studies have not yet been prepared for the project, it is premature to have a realistic assessment of the level of displacement impact that may be induced by the project. Due to the passage of Cyclone Kenneth, informal settlers may be a major issue the project will deal with while respecting the standards set-out by ESS5.

Problems pertaining to land tenure security are linked to the absence of a land registry, poor land registration and the matrilineal system which affirms the indivisibility and inalienability of land, thus making it impossible for the woman, although customarily the owner, to use land for example, in securing a bank loan.

Management/Mitigation
Potential sites will be screened by the E&S specialist to ensure that negative impacts are minimized and that alternatives are considered in cases where there may be some overlap with private (formally purchased), traditional or not recognized owners or users. A Resettlement Framework (RF) and subsequent Resettlement Plans (RPs) will be prepared in line with the ESF ESS5 which shall consider land tenure security and rights of women.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

The standard is currently assessed as relevant. Although, no significant conversion or degradation of natural habitats is expected, the project comprises diverse infrastructure construction works that may interfere with natural habitats.

The rehabilitation of the coastal protection infrastructures will be developed, mostly, in urbanized areas, but the works may interfere, occasionally, with remaining areas of native vegetation. The location of the coastal protection zones, reconstruction of houses have not been defined yet, and there is a possibility of potential impact to natural habitats, however significant adverse impacts to critical habitat and/or protected areas will be screened out through the ESMF and developed in the specific ESIA/ESMPs before launching the bidding process for the respective sub-projects.

The potential impacts on natural habitats will be assessed in the sub-project instruments and environmental assessment required by Comoros environmental regulation and in line with the required E&S instruments described in project ESMF. The impacts and risks to the natural habitats will be assessed in detail, upon the conclusion of the conceptual designs. However, most interventions areas are urbanized and/or degraded, reducing the risk of major environmental impacts to the protection of natural habitats and ecosystem services. Where relevant, appropriate mitigation for impacts to natural habitats will be described in the sub-project instruments.

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

The standard has been assessed as currently not relevant as the presence of Indigenous Peoples/Sub-Saharan Historically Underserved Traditional Local Communities is not foreseen in the project area of influence.

ESS8 Cultural Heritage

The standard has been assessed as currently not relevant. The environmental and social assessment mainly the ESMF will confirm the existence of tangible or intangible cultural heritage. However, all construction contracts will include a "Chance Find" clause which will require contractors to stop construction and follow chance find procedures in the event that cultural property sites are encountered during construction.

ESS9 Financial Intermediaries

The standard has been assessed as currently not relevant as the project will not include any Financial Intermediaries.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways	No
OP 7.60 Projects in Disputed Areas	No

III. BORROWER'S ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

DELIVERABLES against MEASURES AND ACTIONs IDENTIFIED	TIMELINE

ESS 1 Assessment and Management of Environmental and Social Risks and Impacts	
Preparation, consultation and disclosure of the Environmental and Social Management Framework (ESMF).	02/2020
Screen any proposed sub-project in accordance with the Environmental and Social Management Framework (ESMF) prepared for the Project, and, thereafter, draft, adopt, consult, disclose and implement the sub-project instruments in accordance with the ESMF and in a manner acceptable to the Association.	06/2020
Establish and maintain an organizational structure with qualified staff (1 environmental and 1 social specialist) and resources to support management of E&S risks.	02/2020
Incorporate the relevant aspects of the ESCP, including the relevant E&S documents and/or plans, and the Labor Management Procedures, into the ESHS specifications of the procurement documents with contractors. Ensure contractors develop, consult and adopt a contractor ESMs in a manner acceptable to the Association. Thereafter ensure that the contractors comply with the ESHS specifications of their respective contracts.	06/2020
Obtain or assist in obtaining, as appropriate, the permits, consents and authorizations that are applicable to the Project from relevant national authorities.	06/2020
Establish Habitat Committees comprising of female representatives of the local women's groups to ensure women are meaningfully represented in the consultation and land titling processes.	05/2020
ESS 10 Stakeholder Engagement and Information Disclosure	
Update, adopt, and implement Stakeholder Engagement Plan (SEP) and ensure SEP is incorporated into the project's management system, adequate staffing and budget is allocated to implementing the SEP.	02/2020
Adopt, update, maintain and operate a GM, as described in the SEP.	02/2020
Prepare and disclose a draft Stakeholder Engagement Plan (SEP).	10/2019
ESS 2 Labor and Working Conditions	
Preparation, consultation and disclosure of Labor Management Procedures (LMP)	02/2020
Establish, maintain, and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.	06/2020
Prepare, adopt, and implement occupational, health and safety (OHS) measures specified in the ESMP.	06/2020
As part of the OHS measures specified in 2.3, include measures on Emergency Preparedness and Response. Ensure workers and contractors are trained and implement the plan.	06/2020

ESS 3 Resource Efficiency and Pollution Prevention and Management	
As part of the ESMP, develop and implement measures and procedures for managing waste and hazardous materials during demolition, construction and disposal.	06/2020
ESS 4 Community Health and Safety	
Adopt and implement measures and actions to assess and manage traffic and road safety risks as required in the ESMPs to be developed under action 1.3 above.	06/2020
Prepare, adopt, and implement a stand-alone Gender-Based Violence Action Plan (GBV Action Plan) to assess and manage the risks of gender-based violence (GBV) and sexual exploitation and abuse (SEA).	03/2020
Prepare, adopt, and implement a stand-alone Security Personnel Management Plan consistent with the requirements of ESS4, in a manner acceptable to the Association	06/2020
Conduct training for the communities designed to heighten awareness of environmental and social risks and impacts and mitigation measures	06/2020
Prepare, adopt, and implement measures to assess and manage specific risks and impacts to the community arising from Project activities, including behavior of Project workers and risks of labor influx, as part of the ESMP.	06/2020
There will be GBV procedures in place, including training and monitoring, before and during project implementation. This will be defined in the ESMF and through a GBV action plan.	06/2020
ESS 5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	
Prepare, adopt, and implement resettlement plans (RPs) in accordance with ESS5 and consistent with the requirements of the Resettlement Framework (RF) that will be prepared for the Project, and thereafter adopt and implement.	06/2020
Prepare and submit to the Association regular monitoring reports on RAP Implementation.	10/2020
Consult, finalize, adopt, and implement, the Resettlement Framework (RF) that has been prepared for the Project, in a manner acceptable to the Association.	02/2020
ESS 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources	
The sub-project instruments will assess and propose measures to manage risks and impacts to natural habitats consistent with the requirements of this ESS and in a manner acceptable to the Association.	06/2020
ESS 7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities	
ESS 8 Cultural Heritage	

Prepare, adopt, and implement the chance finds procedure described in the ESMF/ESMP developed for the Project.	06/2020
ESS 9 Financial Intermediaries	

B.3. Reliance on Borrower's policy, legal and institutional framework, relevant to the Project risks and impacts

Is this project being prepared for use of Borrower Framework? No

Areas where "Use of Borrower Framework" is being considered:

Use of Borrower Framework is not currently being considered.

IV. CONTACT POINTS

World Bank

Contact:	Van Anh Vu Hong	Title:	Senior Urban Development Specialist
Telephone No:	5220+39651 /	Email:	vvuhong@worldbank.org

Borrower/Client/Recipient

Borrower: Ministry of Finance, Budget and Banking Sector.

Implementing Agency(ies)

Implementing Agency: Directorate General for Civil Security (DGSC)/Center for Relief Operations and Civil Protection (COS

Implementing Agency: Ministry of Land-Use and Urban Planning, in charge of Land issues and Land Transport

V. FOR MORE INFORMATION CONTACT

The World Bank
1818 H Street, NW
Washington, D.C. 20433
Telephone: (202) 473-1000
Web: http://www.worldbank.org/projects

VI. APPROVAL

Task Team Leader(s):	Van Anh Vu Hong
Practice Manager (ENR/Social)	Africa Eshogba Olojoba Cleared on 11-Nov-2019 at 15:10:45 EST

Safeguards Advisor ESSA	Nathalie S. Munzberg (SAESSA) Concurred on 11-Nov-2019 at 15:37:23 EST