



Concept Environmental and Social Review Summary

Concept Stage

(**ESRS Concept Stage**)

Date Prepared/Updated: 03/07/2024 | Report No: ESRSC04108



I. BASIC INFORMATION

A. Basic Operation Data

Operation ID	Product	Operation Acronym	Approval Fiscal Year
P504691	Investment Project Financing (IPF)	Comoros NWRP	2024
Operation Name	Comoros National Water Resilience Project		
Country/Region Code	Beneficiary country/countries (borrower, recipient)	Region	Practice Area (Lead)
Comoros	Comoros	EASTERN AND SOUTHERN AFRICA	Water
Borrower(s)	Implementing Agency(ies)	Estimated Appraisal Date	Estimated Board Date
Union of Comoros	Ministry of Energy, Water and Hydrocarbons	15-Apr-2024	20-Jun-2024
Estimated Concept Review Date	Total Project Cost		
21-Feb-2024	15,000,000.00		

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Proposed Development Objective

To improve reliable access to basic water supply services in Moroni and strengthen governance of sector institutions

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

No

C. Summary Description of Proposed Project Activities

[Description imported from the Concept Data Sheet in the Portal providing information about the key aspects and components/sub-components of the project]

The project aims to improve water supply services in Moroni by improving the reliability of water supply, supporting water service provider performance improvements and improving the resilience of water supply systems to shocks. The project will also support rehabilitation of production, storage and water supply connections. Institutional support, for both water supply and sanitation, will also be provided at the national level to ensure sustainability of service provision and to prepare future sector investments.



D. Environmental and Social Overview

D.1 Overview of Environmental and Social Project Settings

[Description of key features relevant to the operation's environmental and social risks and opportunities (e.g., whether the project is nationwide or regional in scope, urban/rural, in an FCV context, presence of Indigenous Peoples or other minorities, involves associated facilities, high-biodiversity settings, etc.) – Max. character limit 2,000]

The Union of the Comoros is an archipelagic state situated between the coasts of Mozambique and Madagascar in the Southwest Indian Ocean. Access to surface water in Comoros is a challenge and hydrographic potential varies greatly from one island to another. Mohéli has freshwater streams and the freshwater but sulfurous lake Dziani Boundouni. Grande Comore, is volcanically active and has thin and rocky soils, with no perennial streams or large stream valleys. Anjouan also has few permanent freshwater habitats. On the two islands of Ndzuani and Mwali, there are no proven groundwater resources, and the local population is fully reliant on seasonally variable streams. Comoros has relatively high rainfall but it is not evenly distributed seasonally. There are few rivers, and much of the population relies on rainwater harvesting for water supplies, stored in tanks and cisterns. Water supply scarcity impact women/girls particularly in many ways such as resulting lower educational attainment due to time spent buying water. The project intervention will take place across all islands of the country. The Project under its component 1 consists on works and completion of ongoing, rehabilitation and brownfield and aims to implement urgent actions to secure water supply in Moroni and other water insecure regions, whilst at the same time preparing the ground for future medium and long-term interventions for both water security, water resource management, and improved sanitation. The component 2 focusses on TA for institutional strengthening and utility performance improvement. The major environmental and social issues facing this area are mainly erosion due mainly to uncontrolled urbanization and lack of maintenance of sewers and gutters; poor waste management due to lack of controlled landfill and the lack of technical and financial resources of the specialized public services; the difficulty of supplying drinking water.

D.2 Overview of Borrower's Institutional Capacity for Managing Environmental and Social Risks and Impacts

[Description of Borrower's capacity (i.e., prior performance under the Safeguard Policies or ESF, experience applying E&S policies of IFIs, Environmental and social unit/staff already in place) and willingness to manage risks and impacts and of provisions planned or required to have capabilities in place, along with the needs for enhanced support to the Borrower – Max. character limit 2,000]

The project preparation and implementation will be led by the MEEH, responsible for water sector who will host a PIU. The National Environmental Law (No. 94-018 of June 22, 1994; Amended by Law No. 95-007 of June 19, 1995) has provided the impact assessment procedures of activities likely to generate risks and impacts to the environment. Any development project proposed by any natural or legal person, private or public, is now subject to a prior environmental impact assessment. Decree No. 01/52/CE on environmental impact studies aims to regulate the procedures for conducting impact studies. There is a list of projects and activities subjected to. This Decree does not precisely determine the procedures for control, monitoring, and surveillance during implementation. Referring to the list of activities subject an ESIA study under Article 11 amended by the framework law on the environment, project's activities are subject to an Environmental and Social Impact Assessments (ESIA) ESIA. The projects and subprojects classification should be made to the environmental authorities when the project is better characterized. The borrower have limited knowledge and experience in managing E&S risks and implementation of measures in line with the ESF standards. The team will conduct E&S assessment of the implementing unit, stakeholders and the involved communities to ensure a good management of E&S risks and impacts during project preparation. To address any gaps' capacity in the Borrower Framework, ESIA's will be developed with the necessary procedures and implementation arrangements to ensure that E&S risks are managed to meet WB requirements. In addition, a draft capacity building action plan on implementation



of E&S measures should be developed prior to appraisal and measures captured as part of the Environmental and Social Commitment Plan (ESCP) appraisal stage. The project will hire one Environmental and one Social specialists.

II. SCREENING OF POTENTIAL ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC)

Moderate

A.1 Environmental Risk Rating

Moderate

[Summary of key factors contributing to risk rating, in accordance with the ES Directive and the Technical Note on Screening and Risk Classification under the ESF – Max. character limit 2,000]

Environmental risk is rated as "Moderate" at the concept stage. Overall, the project will bring positive development impacts with respect to people’s access to water Comoros. Therefore, the civil works will be associated mainly with existing infrastructures. Potential environmental risks and impacts are expected under Component1 : securing the main water source in Moroni, including completing works for the main pipeline and financing emergency acquisitions for the water source, as well as targeted investments on the other smaller islands, including construction of networks for existing but currently unconnected wells, limited new household connections, and rehabilitation works. Key anticipated direct, indirect, and cumulative risks and impacts associated with project activities will entail disruption of traffic in the project area due to trench excavation work to install drinking water distribution pipes, OHS risks for workers, community health and safety risks for communities around works sites, waste generation including reservoir sludge, risks related to chemical water treatment, risks of pollution, inadequate wastewater management that can promote the proliferation of insects, risk of waterborne diseases if water distributed to communities is not well treated and stored appropriately in reservoirs. TA activities under components 2 related to capacity development to the SONEDE’s water supply operations, clarifying arrangements for sanitation service provision and improving solid waste management services and institutional oversight are not expected to lead significant adverse risks and impacts. The risk rating considers the capacity of stakeholders involved in project, especially MEEH for the water sector, SONEDE and Comorian Environmental authorities to manage potential E&S risks and impacts and to implement ESF. However, the project ESRC will be reassessed at Appraisal.

A.2 Social Risk Rating

Moderate

[Summary of key factors contributing to risk rating, in accordance with the ES Directive and the Technical Note on Screening and Risk Classification under the ESF – Max. character limit 2,000]

The social risk rating (SRR) has been classified as Moderate. The expected social risks and impacts of the Project are mainly related to: (i) community health and safety risks associated with the expected civil works, including traffic accidents and other road safety risks, and the transmission of diseases such as STDs and COVID-19; (ii) labor risks, particularly as they relate to the potential discrimination of workers, especially of migrant workers, labor influx and the risk of child labor and unfair working conditions; (iii) risks associated with the intensification of Sexual and Exploitation and Abuse and Sexual harassment (SEA/SH), particularly considering that some interventions may require the engagement of foreign companies / workers with specializations not available at the local labor market; (iv) potential limited land acquisition and land access restrictions, which could lead to economic displacement and disruption to livelihoods, and probably physical displacement because the project will undertake construction and rehabilitation of water supply infrastructure in Moroni as well as in rural and small town in the other smaller island; and (v) risk of elite capture of project benefits. However these social impacts and risks are not expected to be

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particularly significant, as rehabilitation works , concerns existing pipe and available storages and reservoirs; and construction of networks concerns existing but currently unconnected wells, and limited new household connections. The social risks associated with the activities to be supported under the technical assistance component will be also further assessed as part of the Bank’s due diligence during project preparation. Social risk and impacts will be re-assessed at appraisal.

[Summary of key factors contributing to risk rating. This attribute is only for the internal version of the download document and not a part of the disclosable version – Max. character limit 2,000]

B. Relevance of Standards and Policies at Concept Stage

B.1 Relevance of Environmental and Social Standards

ESS1 - Assessment and Management of Environmental and Social Risks and Impacts Relevant

[Optional Explanation - Max. character limit 1,000]

ESS1 is relevant for the project. The anticipated significant E&S impacts are related to component 1 and 2. These activities might cause of direct environmental and social risks and will likely generate adverse sites specifics risks and impacts such as loss of vegetation, soil erosion and degradation, soil and surface water pollution, dust and noise emissions, impact on water usage and quality, generation and disposal of construction, waste, occupational health and safety concerns to contracted workers, community health and safety risks caused by public nuisance, increased road traffic, propagation of diseases (STD), loss of land and loss or the disruption of income streams and livelihood activities for individuals or groups of people and economic displacement, and also risk of SEA/SH. The component 2 may generate downstream impacts and risks such as conflicts and discriminatory conducts due to inequitable access to water services. These risks should be considered and further explored.

ESS10 - Stakeholder Engagement and Information Disclosure Relevant

[Optional Explanation - Max. character limit 1,000]

ESS10 is relevant. Stakeholders preliminarily identified include MEEH (the Ministry in charge of Water), Ministry of Agriculture and Environment (MAPET), Ministry of Urbanism (MATIUH), Ministry of Health (MSSPS), Ministry of the Interior (MI), authorities in the targeted city and island, project affected persons, land management agencies, construction firms, community-based organizations including marginalized, and women’s groups in particular to ensure women’s participation in water management structures. The impact that women would make their voice heard in the water sector will be further assessed at Appraisal. The Project will carry out stakeholder engagement (SE) activities during its preparation to inform the design of the project and its E&S instruments. SE and information disclosure shall be at the heart of the project throughout its lifecycle. Details of the SE activities will be included in the Stakeholder Engagement Plan (SEP) to be prepared and disclosed by Appraisal.

ESS2 - Labor and Working Conditions Relevant

[Optional Explanation - Max. character limit 1,000]

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ESS2 is relevant. Project workers will include direct workers (PIU workers hired by the project), contracted workers (technical consultants supporting the PIU at central level, workers of civil works' contractors and supervising engineers); primary supply workers, such as people employed by Borrower's primary suppliers and materials suppliers for construction and rehabilitation (Component 1). Risks under ESS2 include (i) OHS induced by civil works, including workers' health, which might be affected by pollution in worker's camps; (ii) risk of child labor, particularly among the primary suppliers, and SEA/SH among workers; (iii) risks associated with working conditions, and management of worker relationships; and (iv) potential discrimination against some workers, particularly migrants.

ESS3 - Resource Efficiency and Pollution Prevention and Management

Relevant

[Optional Explanation - Max. character limit 1,000]

ESS3 is relevant. Detailed activities are not defined at this stage. Infrastructure rehabilitation activities may result in pollution to land, water, and air resources as well as use of natural resources : (i) disposal and management of waste during the renovation works; (ii) non-significant public health concerns from air pollution, noise, dust and to nuisance vibration. A detailed water balance is not considered necessary because the project is not expected to impact availability and distribution to existing users. ESIA's will identify and assess all risks and impacts for projects activities under component 1 associated to relevant requirements of ESS3 (including water use, raw materials, air emissions, vegetation and soil loss, waste management (such as reservoir sludge), etc) and will propose standardized measures to address these risks. Appropriate mitigation measures to manage hazardous and non-hazardous wastes will be included in the ESMPs to be prepared.

ESS4 - Community Health and Safety

Relevant

[Optional Explanation - Max. character limit 1,000]

ESS4 is relevant to the project. Community health and safety issues are associated with typical risks/impacts of civil works under Components 1, such as dust, noise, vibrations, waste and traffic, road safety. The propagation of COVID-19 as a result of all project activities might be also identified as a potential risk. Civil works may result in the presence of workers and/or influx of opportunistic migrants from other region, islands or countries that might affect community health on the spread of sexually transmitted and communicable diseases, and potential risk of SEA/SH. In line with the E&S procedures ESIA's will identify all project related risks and impacts and propose mitigation measures and appropriate management plans such as the ESMPs for managing such risks and impacts that will provide more site-specific and detailed mitigation measures, monitoring indicators, budget and roles and responsibilities.

ESS5 - Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

Relevant

[Optional Explanation - Max. character limit 1,000]

ESS5 is relevant. The securisation of the main water source in Moroni, including completing works for the main pipeline, rehabilitation of available storages and existing reservoir, and financing emergency acquisitions for the water source, as well as targeted investments on the other smaller islands, including construction of networks for existing but currently unconnected wells, limited new household connections, and rehabilitation works may require land acquisition, access restrictions and disruption to livelihoods. This might lead to the loss of land or disruption of income streams and livelihood activities for individuals or groups. Most of the impact will be a temporary economic

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displacement. Physical displacement is probably expected. The scope of this impact will be further assessed at Appraisal. The project will develop a Resettlement Framework (RF) that will include all measures for managing impacts related to resettlement and land acquisition and to guide development of RPs.

ESS6 - Biodiversity Conservation and Sustainable Management of Living Natural Resources

Relevant

[Optional Explanation - Max. character limit 1,000]

ESS6 is relevant to the project. At this stage, the locations of subprojects and, the nature of biodiversity and its sensitivity within each project areas are not yet known. Impacts to critical and natural habitats are not expected because the project is expected to be implemented in urbanized areas and focus on rehabilitation of existing infrastructure. Therefore, s the project try to enhance water supply, explore new water source and build a pipeline, it might induce the clearance and loss of areas of vegetation and fauna habitat as well as habitat fragment. The project will not support activities, subprojects that would involve significant conversion or degradation of critical habitat.

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

Not Currently Relevant

[Optional Explanation - Max. character limit 1,000]

ESS7 is not relevant for this project. There are no Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities that meet the criteria of IP/SSHAUTLCs, per the requirements of this Standard in Comoros.

ESS8 - Cultural Heritage

Relevant

[Optional Explanation - Max. character limit 1,000]

ESS8 is considered relevant. However, the Program activities are unlikely to affect tangible and intangible cultural heritage as they will mainly be implemented in existing areas. Key physical investments will be undertaken in areas where the likelihood of existence of tangible and intangible cultural heritage is low. Chance Find Procedures shall be adopted for precautionary reasons for infrastructure investments to address unknown archeological or historical remains and objects and the procedure will be described in ESIA. Project workers shall be trained in Chance Find Procedures.

ESS9 - Financial Intermediaries

Not Currently Relevant

[Optional Explanation - Max. character limit 1,000]

ESS9 is not considered relevant for this project. No financial intermediaries are expected for the project implementation.

B.2 Legal Operational Policies that Apply

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OP 7.50 Operations on International Waterways

No

OP 7.60 Operations in Disputed Areas

No

B.3 Other Salient Features

Use of Borrower Framework

No

[Optional explanation – Max. character limit 1,000]

N/A

Use of Common Approach

No

[Optional Explanation including list of possible financing partners – Max. character limit 1,000]

N/A

B.4 Summary of Assessment of Environmental and Social Risks and Impacts

[Description provided will not be disclosed but will flow as a one time flow to the Concept Stage PID – Max. character limit 5,000]

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risk of child labor and unfair working conditions; (iii) risks associated with the intensification of Sexual and Exploitation and Abuse and Sexual harassment (SEA/SH), particularly considering that some interventions may require the engagement of foreign companies / workers with specializations not available at the local labor market; (iv) potential limited land acquisition and land access restrictions, which could lead to economic displacement and disruption to livelihoods, and probably physical displacement because the project will undertake construction and rehabilitation of water supply infrastructure in Moroni as well as in rural and small town in the other smaller island; and (v) risk of elite capture of project benefits. However these social impacts and risks are not expected to be particularly significant, as rehabilitation works , concerns existing pipe and available storages and reservoirs; and construction of networks concerns existing but currently unconnected wells, and limited new household connections. The social risks associated with the activities to be supported under the technical assistance component will be also further assessed as part of the Bank’s due diligence during project preparation. Social risk and impacts will be re-assessed at appraisal.

The E&S risk management capacity of the borrower is limited at this stage. The Bank team will provide training on the standards of the new ESF during project preparation and implementation to strengthen the Borrowers capacity to develop and implement E&S measures.

The ESRC will be reassessed at Appraisal.

C. Overview of Required Environmental and Social Risk Management Activities

C.1 What Borrower environmental and social analyses, instruments, plans and/or frameworks are planned or required by Appraisal?

[Description of expectations in terms of documents to be prepared to assess and manage the project’s environmental and social risks and by when (i.e., prior to Effectiveness, or during implementation), highlighted features of ESA documents, other project documents where environmental and social measures are to be included, and the related due diligence process planned to be carried out by the World Bank, including sources of information for the due diligence - Max. character limit 3,000]

To limit the above E&S risks and impacts, the project will develop and disclose by appraisal

- (i) Draft Environmental and Social Commitment Plan (ESCP);
- (ii) Draft Stakeholder Engagement Plan (SEP) including the Grievance Mechanism (GM), and a record of the stakeholder engagement activities carried out during project preparation;
- (iii) Scoping document to support the development of Environmental and Social Impact Assessment (ESIAs).

The Borrower will also carry out stakeholder engagement activities during project preparation, to inform the design of the project and the preparation of its E&S risk management instruments.

These will be further assessed and explored at appraisal: (i) The impact of labor influx, (ii) Groups currently have more difficult access to water services and some social groups who may also result being more privileged than others.

During project implementation but before the start of the expected activities, the Borrower will prepare, disclose, and adopt:

- (iii) Environmental Social Impact Assessment/ environmental and social management plans (ESIAs/ESMPs) including a SEA/SH Action Plan



(iv) Resettlement Framework (RF) that will include all measures and processes for managing impacts related to resettlement and land acquisition, livelihood restoration, and to guide the development of subsequent Resettlement Plans (RPs).

(v) Labor Management Procedures (LMP), including code of conduct with SEA/SH.

The specific timeframe for these instruments will be defined in the ESCP. No activities or bidding processes will commence before these instruments have been finalized and disclosed.

III. CONTACT POINT

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IV. FOR MORE INFORMATION CONTACT

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V. APPROVAL

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