



Unité - Solidarité - Développement

**The Union of Comoros
MINISTRY OF HEALTH, SOLIDARITY, SOCIAL
PROTECTION AND PROMOTION OF GENDER**

**Commissariat for Solidarity, Social Protection and Gender
Promotion**

**Shock responsive and resilient social safety net
project in Comoros - P179291**

**ENVIRONMENTAL AND SOCIAL
COMMITMENT PLAN (ESCP)**

Negotiated version

22 November 2022

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Union of Comoros (the Recipient) shall implement the Shock responsive and resilient social safety net project in Comoros (the Project), through the Ministry of Health, Solidarity, Social Protection and the Gender Promotion as Project Implementation Unit (PIU) and with contribution of the Ministry of Finances, Budget and Banking, as indicated into the Financing Agreement. The International Development Association (the Association) has agreed to provide financing for the Project
2. The Recipient shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Association. The ESCP is a part of the Financing Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreement.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Recipient shall carry out or cause to be carried out, including, as applicable, the timeframes of the actions and measures, institutional, staffing, training, monitoring and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, and in form and substance, and in a manner acceptable to the Association. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the Association.
4. As agreed by the Association and the Recipient, this ESCP will be revised from time to time if necessary, during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the Recipient through the 'Unité de Gestion de Projets Filets Sociaux de Sécurité ' (UGP-FSS) UGP-FSS Coordinators of the UGP and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient through the General Secretary of the Ministry of Health, Solidarity, Social Protection and the Gender Promotion. The Recipient shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>The Recipient shall prepare and submit to the Association regular monitoring reports on the (i) environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the (ii) Environmental and Social Management Framework (ESMF), (iii) status of preparation and implementation of E&S instruments required under the ESCP, (iv) stakeholder engagement plan (SEP), (v) implementation of the Labor Management Procedures (LMP), (vi) Grievance Mechanism (GM) and (viii) GBV/ SEAH/SH Action Plan.</p>	<p>Submit Quarterly reports to the Association throughout Project implementation, commencing after the Effective Date. Submit each report to the Association no later than 15 days after the end of each reporting period.</p>	<p>Responsible entity: - Project Implementation Unit</p>
B	<p>INCIDENTS AND ACCIDENTS</p> <p>Promptly notify the Association of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including, inter alia, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injury, intoxication. Provide sufficient detail regarding the scope, severity, and possible causes of the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and/or supervising firm, as appropriate.</p> <p>Subsequently, at the Association’s request, prepare a report on the incident or accident and propose any measures to address it and prevent its recurrence consistent with measures described into SEP, LMP and ESMF of the project.</p>	<p>Notify the Association no later than 48 hours after learning of the incident or accident.</p> <p>Provide subsequent report to the Association within a timeframe acceptable to the Association.</p> <p>For incidents related to GBV/EAS-SH, the survivor should be immediately referred to services, the PIU should be notified immediately the Association within 48 hours.</p>	<p>Responsible entity: - Project Implementation Unit</p>
C	<p>CONTRACTORS’ MONTHLY REPORTS</p> <p>Require contractors and supervising firms to provide monthly monitoring reports on ESHS performance in accordance with the metrics specified in the respective bidding documents and contracts, and submit such reports to the Association.</p>	<p>Submit the monthly reports to the Association upon request and as annexes to the reports to be submitted under action A above.</p>	<p>Responsible entity: - Project Implementation Unit - Regional Implementation Unit (regional)</p>
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>a) Maintain and retain the Project Implementation Unit (PIU) under the Social Safety Net Project (P150754) with qualified staff and resources to support management of ESHS risks and impacts of the Project including an Environmental Specialist, and a Social Specialist.</p>	<p>a) Renew the existing Environmental Specialist, hire the Social specialist no later than 2 months after the Project Effective Date, and thereafter maintain these positions throughout Project implementation.</p>	<p>Responsible entity: - Project Implementation Unit</p>
	<p>b) Establish Regional Office with 1 Assistant Environmental Specialist and 1 Assistant Social Specialist, with proven experience in the context of E&S compliance, to support management of ESHS risks and impacts of the Project at each regional area.</p>	<p>b) Hire the Assistant E&S specialists at each region no later than 2 months after the Project Effective Date, and thereafter maintain these positions throughout Project implementation.</p>	
1.2	<p>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</p> <p>a) Adopt and implement the below E&S instruments consistent with the relevant ESSs:</p> <ul style="list-style-type: none"> - an Environmental and Social Management Framework (ESMF) and environmental and social instruments including a SEA-SH Action Plan and an Integrated Pesticide Management Plan (IPMP), consistent with the relevant ESSs. - a Labor Management Procedures (LMP) - a Stakeholder Engagement Plan (SEP) - Resettlement Framework (RF) <p>b) Prepare, adopt and implement subproject Environmental and Social Assessments consistent with the relevant ESSs as set out in the ESMF. Proposed subprojects described in the exclusion list shall be ineligible to receive financing under the Project, such as:</p> <ul style="list-style-type: none"> - Sub-projects in contradiction with the National or Regional development policy ; - Sub-projects with high recurrent costs; - Activities which are in progress or already planned within the framework of other projects or programs outside the Safety Net project; - Sub-projects that do not meet the environmental and social eligibility conditions; - large-scale projects (roads, bridges,, ...) 	<p>a) LMP, SEP, were disclosed on 19 November 2022. Draft ESMF is developed and will be disclosed for public consultation after Recipient and Association clearance. Finalize, adopt and re-disclose prior to disbursement of component 2, and thereafter implement throughout Project implementation. Any subsequent updates shall be submitted to the Association for approval.</p> <p>b) Adopt the relevant subproject instruments prior to the bidding process and prior to carrying out for the respective subproject that requires such instruments, and thereafter implement throughout Project implementation.</p>	<p>Responsible entity: - Project Implementation Unit</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.3	<p>MANAGEMENT OF CONTRACTORS</p> <p>a) Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&S instruments, the Labor Management Procedures, and code of conduct, into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply and cause subcontractors to comply with the ESHS specifications of their respective contracts.</p> <p>b) Develop, submit for approval, and implement the following procedures applicable to contractors, subcontractors and control firm: Contractor-ESMP (C-ESMP) – work site, Hygiene, Health, Safety and Environment Plan (HSEP), Environmental and Social Clauses, Codes of Conduct, Grievance Mechanism, Social Commitments on Child Labor and other elements provided for in the SEA-SH Action Plan included in ESMF.</p>	<p>a) As part of the preparation of procurement documents and respective contracts. Supervise contractors throughout Project implementation.</p> <p>b) Apply these measures prior to commencement of relevant works and implement throughout the Project implementation period</p>	<p>Responsible entity: Project Implementation Unit</p>
1.4	<p>TECHNICAL ASSISTANCE</p> <p>Ensure that the consultancies, studies (including feasibility studies), capacity building, training, and any other technical assistance activities under the Project, are carried out in accordance with terms of reference acceptable to the Association, that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.</p>	<p>Throughout Project implementation.</p>	<p>Responsible entity: - Project Implementation Unit</p>
1.5	<p>CONTINGENT EMERGENCY RESPONSE FINANCING</p> <p>a) Ensure that the CERC Manual includes a description of the ESHS assessment and management arrangements in accordance with the ESSs.</p> <p>b) Prepare and adopt any environmental and social (E&S) instruments required under the CERC component, in accordance with the CERC Annex of the ESMF, the CERC Manual and the ESSs, and thereafter implement the measures and actions required under said CERC E&S instruments, within the timeframes specified in said E&S instruments.</p>	<p>a) The adoption of the CERC Manual, as relevant in form and substance acceptable to the Association are a withdrawal condition for the CERC component.</p> <p>b) Adopt the required CERC E&S instruments and include it as part of the respective bidding process, if applicable, and in any case, before the carrying out of the relevant Project activities. Implement the CERC E&S instruments in accordance with their terms, throughout Project implementation.</p>	<p>Responsible entity: - Project Implementation Unit</p>
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p>		<p>Responsible entity:</p>

	MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
	<p>a) The Labor Management Procedures (LMP) have been prepared and shall be adopted, including, inter alia, provisions on working conditions, management of workers relationships, occupational health and safety (including personal protective equipment, and emergency preparedness and response), code of conduct (including relating to SEA and SH), forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms.</p> <p>b) Ensure the signing of contracts, including the code of conduct, with all direct workers, contracted workers and primary supplier workers consistent with the LMP.</p>	<p>a) The project LMP were disclosed on 19 November 2022. It shall be implemented throughout Project implementation. Any subsequent updates to the LMP shall be submitted to the Association for approval prior to implementation.</p> <p>b) Prior engaging any Project workers. Before the start of Project staff service and thereafter maintain throughout the Project implementation.</p>	<p>- Project Implementation Unit</p>
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS Establish and operate a grievance mechanism (GM) for Project workers, as described in the LMPs and consistent with ESS2.</p>	<p>The Project worker GM shall be operational prior to engaging Project workers and thereafter maintain and operate it throughout Project implementation.</p>	<p>Responsible entity: - Project Implementation Unit</p>
2.3	<p>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</p> <p>a) Integrate into the Project Operation manual and all contracts signed, including for PIU workers, the measures relating to occupational health and safety contained in ESS2 and, as applicable, the labor code and related national regulations in force, and as spelled out in the LMP.</p> <p>b) Adopt a section on emergency response management in the Project Operations Manual and ensure that Contractors prepare and implement an emergency preparedness and response plan and coordinate with related measures.</p> <p>c) Adopt and implement specific provisions for pandemic health barrier measures for COVID-19 for Project workers, to be developed under the ESMF and include these measures in the LMP and relevant ESAs/ESMPs in a manner satisfactory to the Association.</p>	<p>a) & b) Adopt POMs as a disbursement condition of the Project. Include measures in bidding documents as part of the procurement process and in the contracts prior to signing. Any subsequent updates to this Project Operations manual shall be submitted to the Association for approval prior to implementation. Once approved, the manual shall be maintained and implemented throughout the execution of the Project.</p> <p>c) Adopt these measures on timeframes specified for the ESMF, LMP, and ESAs/ESMPs, and implement these measures as long as the Covid-19 pandemic persists</p>	<p>Responsible entity: - Project Implementation Unit</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	WASTE MANAGEMENT PLAN Adopt and implement a Waste Management Plan (WMP), as part of relevant sub-project instruments, to manage hazardous and non-hazardous wastes, consistent with ESS3.	Adopt the WMP within the same timeframe as for the adoption and implementation of the sub-project ESMPs, and thereafter implement the WMP throughout Project implementation.	Responsible entity: - Project Implementation Unit
3.2	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT Adopt and implement adequate measures into sub-project ESMPs to manage efficiently energy, water or raw materials.	During preparation of the sub-project ESMPs, and thereafter implement the related measures throughout Project implementation.	Responsible entity: - Project Implementation Unit
3.3	PEST AND PESTICIDE MANAGEMENT The preparation of a pesticide management plan is not necessary at this stage. Standardized mitigation measures to address pesticides management can be incorporated in the ESMP section of the ESMF consistent with the ESS3	Same timeline as for the adoption of the ESMF. Any subsequent updates shall be submitted to the Association for approval.	Responsible entity: - Project Implementation Unit
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	TRAFFIC AND ROAD SAFETY Incorporate measures to manage traffic and road safety risks as required in the ESMPs to be prepared under action 1.2 above.	Same timeframe as for the adoption and implementation of the ESMPs.	Responsible entity: - Project Implementation Unit
4.2	COMMUNITY HEALTH AND SAFETY Assess and manage specific risks and impacts to the community arising from Project activities, including, inter alia behavior of Project workers, , propagation of COVID-19 risks for local population; security risks related to cash handling , response to emergency situations, agricultural operation production risks, and include mitigation measures in the ESMPs to be prepared in accordance with the ESMF.	Same timeframe as for the adoption and implementation of the ESMPs.	Responsible entity: - Project Implementation Unit
4.3	SEA AND SH RISKS a) Update existing SEA/SH Action Plans, already developed for existing Comoros Safety Net project then implement, to assess and manage the risks of SEA and SH.	a) Same timeframe as the ESMF, and thereafter implement the SEA/SH Action Plan throughout Project implementation. Any subsequent SEA-SH Action Plan update shall be submitted to the Association for approval before implementation. Once approved, the SEA-SH Action Plan must be implemented throughout Project implementation.	Responsible entity: - Project Implementation Unit

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	b) Integrate Codes of conduct and SEA-SH prevention measures into contractual and procurement documents (ToRs, DAOs, workers' contracts).	b) During preparation of procurement documents (ToRs, DAOs, workers' contracts)	
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	RESETTLEMENT POLICY FRAMEWORK Adopt and implement a Resettlement Framework (RF), consistent with ESS5.	Draft RF is developed and will be disclosed for public consultation after Recipient and Association clearance. Finalize, adopt and re-disclose prior to disbursement of component 2.2, and thereafter implement throughout Project implementation. Any subsequent updates shall be submitted to the Association for approval.	Responsible entity: - Project Implementation Unit
5.2	RESETTLEMENT PLANS a) Adopt and implement Resettlement Plans (RPs), and Livelihood Restoration Plans (LRPs), as necessary, for each subproject as set out in the RF, and consistent with ESS5 and in a manner satisfactory to the Association. b) Develop and submit to the Association monthly progress report on the Resettlement Plan implementation, and develop and submit to the Association a completion report of the Resettlement Plan implementation	a) Adopt and implement the respective RP before the start of any activity inducing the need of land acquisition and/or involuntary resettlement, including ensuring that before taking possession of the land and related assets, full compensation has been provided and as applicable displaced people have been resettled and moving allowances have been provided. b) Adopt monthly progress report of the RPs implementation prior first week of the month. Adopt completion report of RP before the end of the relevant RP.	Responsible entity: - Project Implementation Unit - Regional Implementation Unit (regional)
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	BIODIVERSITY RISKS AND IMPACTS As part of ESIA's and ESMPs, adopt and implement mitigation measures to manage biodiversity impacts in accordance with the measures described in the ESMF and consistent with the provisions of ESS 6, in a manner acceptable to the Association.	Same timeframe as for the adoption and implementation of the ESIA's or ESMPs.	Responsible entity: - Project Implementation Unit
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
NOT RELEVANT			
ESS 8: CULTURAL HERITAGE			
NOT RELEVANT			
ESS 9: FINANCIAL INTERMEDIARIES			
NOT RELEVANT			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</p> <p>Adopt and implement a Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, which include measures to, inter alia, 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.</p>	<p>The SEP was disclosed on 19 November 2022, and thereafter shall be implemented throughout Project implementation.</p> <p>Any subsequent updates to the SEP shall be submitted to the Association for approval. Once approved, the SEP shall be implemented throughout the implementation of the Project</p>	<p>Responsible entity: - Project Implementation Unit</p>
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>Update existing GM, publicize, maintain, and operate an accessible grievance mechanism, as part of SEP, ESMF and RF, to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10.</p> <p>The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.</p>	<p>Update the grievance mechanism no later than two months after the Project Effective Date, and thereafter maintain and operate the mechanism throughout Project implementation.</p> <p>Any subsequent updates to the GM must be submitted to the Association for approval prior to implementation. Once approved, the GM shall be operationalized and monitored throughout Project implementation</p>	<p>Responsible entity: - Project Implementation Unit</p>
CAPACITY SUPPORT			
CS1	<p>Develop and submit to the Association a Capacity Building Plan for PIU staff on:</p> <ul style="list-style-type: none"> • Stakeholder mapping and engagement • Specific aspects of environmental and social assessment • Emergency preparedness and response • Community health and safety • Occupational Health and Safety • Incident reporting 	<p>Adopt the Capacity Building plan no later than 03 months after the Effective date and implement during the implementation of the Project.</p>	<p>Responsible entity: - Project Implementation Unit</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<ul style="list-style-type: none"> • ESF, ESS and World Bank Group EHS Guidelines • Health and safety of workers and communities • GBV risk mitigation • Inclusion of vulnerable and disadvantaged groups in the consultation process • Grievance Mechanism • Development, implementation, monitoring and reporting in accordance with the LMP • Awareness and prevention of sexually transmitted infections: HIV/AIDS, etc. • Awareness on SEA-SH and child labor • Raising awareness on barrier measures against the spread of Covid-19 • Implementation of RP 		
CS2	<p>Develop and submit to the Association a Capacity Building Plan for contractors and sub-contractors on:</p> <ul style="list-style-type: none"> - Introduction to the ESF, ESS and World Bank Group EHS Guidelines - Implementation of ESMPs, including: <ul style="list-style-type: none"> - Health and safety of workers and communities - GBV awareness, control and prevention - Emergency preparedness and response - Grievance mechanism - Development, implementation, monitoring and reporting in accordance with the LMP - Awareness and prevention of sexually transmitted infections: HIV/AIDS etc. - Awareness and prevention of child labor - Awareness on measures against the spread and control of Covid-19 - Occupational health and safety including: <ul style="list-style-type: none"> - Emergency prevention and preparedness - Response arrangements to emergency situations - Incident reporting 	Adopt the Capacity Building plan no later than 03 months after the Effective date and implement during the implementation of the Project.	Responsible entity: - Project Implementation Unit
CS3	<p>Develop and submit to the Association a Capacity Building Plan for other stakeholder staff and communities on:</p> <ul style="list-style-type: none"> • Introduction to the ESF, ESS and World Bank Group EHS Guidelines • Community health and safety • GBV awareness, control and prevention • Awareness and prevention of child labor • Grievance mechanism • SEP Implementation 	Adopt the Capacity Building plan no later than 03 months after the Effective date and implement during the implementation of the Project.	Responsible entity: - Project Implementation Unit