



Unity - Solidarity - Development

MINISTRY OF HEALTH AND SOCIAL PROTECTION

Directorate General for Social Protection

PROJECT IMPLEMENTATION UNIT

SHOCK RESPONSIVE AND RESILIENT SOCIAL SAFETY NET PROJET – Original Financing and Additional Financing (P179291)

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

Negotiated version

24 June 2026

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Union of the Comoros (the Recipient) is implementing the Shock-Responsive and Resilient Social Safety Net Project in the Comoros (the Project), with the participation of the Ministry of Health and Social Protection, and the Social Safety Nets Project Implementation Unit (PIU), with the participation of, among others, the Ministry of Finance, Budget, and the Banking Sector, as indicated in the Original and Additional Financing Agreement (the Agreements). The International Development Association (the Association) has agreed to provide the original financing (P179291) and Additional Financing (AF) for the Project as indicated in the aforementioned Agreements. This ESCP supersedes previous versions of the ESCP for the Project and shall apply both to the original and the additional financing for the Project referred to above.
2. The Recipient shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESS) and the provisions of this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Association. The ESCP forms part of the Agreements. Unless otherwise specified in this ESCP, capitalized terms used herein shall have the meanings assigned to them in the Agreements.
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, their respective timeframes; institutional, staffing, training, monitoring and reporting arrangements; and grievance management. The ESCP also sets out the environmental and social (E&S) documents that shall be prepared or updated, consulted, disclosed and implemented under the Project, consistent with the ESSs, in form and substance acceptable to the Association. Said E&S documents may be revised from time to time with prior written agreement by the Association. As provided for under the referred Agreements, the Recipient shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.
4. As agreed by the Association and the Recipient, this ESCP will be revised from time to time, if necessary, to reflect adaptive management of Project changes or unforeseen circumstances or in response to Project performance. In such circumstances, the Association and the Recipient agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient's Representative specified in the Agreements or the Coordinator of the PIU. The Recipient shall promptly disclose the updated ESCP.
5. The subsection "Indicators of Implementation Readiness" below identifies the actions and measures to be taken to assess the project's implementation readiness in accordance with this ESCP. However, all actions and measures outlined in this ESCP must be implemented as indicated in the "Timeline/Deadlines" column below, whether or not they are listed in the subsection in question.

MATERIAL MEASURES AND ACTIONS		CALENDAR	RESPONSIBLE ENTITY
IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT			
A	ORGANIZATIONAL STRUCTURE a) Maintain the existing Project Implementation Unit (PIU) of the ongoing Shock-Responsive and Resilient Social Safety Net project (P179291) with qualified staff and resources to support the management of environmental, social (E&S), health and safety risks and impacts of the initial project and the AF, including an environmental specialist and a social specialist. b) Maintain regional implementation offices with 1 environmental specialist assistant and 1 social specialist assistant, with proven experience in E&S compliance, to support the management of the project's E&S risks and impacts in each regional area.	a) Maintain the Environmental Specialist and Social Specialist positions throughout the implementation of the initial project and the AF. b) Maintain E&S specialist assistants in each region throughout the implementation of the initial project and the AF.	<i>Project Implementation Unit (PIU)</i>
B	Update and submit to the Association a capacity-building plan for PIU staff on: • Mapping and mobilizing stakeholders • Specific aspects of environmental and social assessment • Emergency preparedness and response • Health and safety of populations • Occupational health and safety • Incident reporting • ESF, ESS, World Bank Group ESS Guidelines • Health and safety of workers and communities • Mitigating the risks associated with gender-based violence • Inclusion of vulnerable and disadvantaged groups in the consultation process • Grievance Mechanism • Development, implementation, monitoring and reporting in accordance with the LMP • Raising awareness and preventing sexually transmitted infections: HIV/AIDS, etc. • Raising awareness of SEA-SH and the prevention of child labor; • Implementation of the RP Update and submit to the Association a capacity-building plan for contractors and subcontractors on: • Introduction to the ESS guidelines, the ESF, and the ESS of the World Bank Group • Implementation of Environmental and Social Management Plans (ESMPs), including: • Health and safety of workers and the public • Gender-Based Violence Awareness, Control and Prevention • Emergency preparedness and response • Grievance Mechanism • Development, implementation, monitoring and reporting in accordance with the LMP	Update capacity building plans for PIU staff, for contractors and subcontractors, as well as communities and other stakeholders. and submit 30 days after AF effective date. Then, implement during the implementation of the initial project and the AF.	<i>Project Implementation Unit</i>

	• Raising awareness and preventing sexually transmitted infections: HIV/AIDS, etc. • Raising awareness about child labor • Occupational health and safety, including: • Prevention and preparedness for emergency situations • Emergency response procedures • Incident reporting Update and submit to the Association a capacity-building plan for other stakeholders and communities on: • Introduction to the ESS, ESF and World Bank Group guidelines • Raising awareness about the prevention of child labor • Health and safety of populations • Gender-Based Violence Awareness, Control and Prevention • Grievance Mechanism • Implementation of the SEP		
MONITORING AND REPORTING			
C	REGULAR REPORTS Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (E&S) performance of the Project, including, but not limited to: • the implementation of the updated Environmental and Social Management Framework (ESMF), • the readiness and implementation of the E&S instruments required under the ESCP, • the updated Stakeholder Engagement Plan (SEP), • the implementation of the Labor Management Procedures (LMP), • the Grievance Mechanism (GM) and • the GBV/SEA-SH action plan, updated in the ESMF	Submit quarterly reports to the Association throughout the Project implementation, starting from the effective date. Submit each report to the Association no later than 15 days after the end of each reporting period	<i>Project Implementation Unit</i>

D	MONTHLY REPORTS FROM SUPPLIERS AND SERVICE PROVIDERS Require suppliers, service providers, and contractors to produce monthly reports monitoring environmental, health, and safety performance in accordance with the indicators specified in the tender documents and respective contracts, and to communicate these reports to the Association.	Submit monthly reports to the Association upon request and as annexes to the reports to be submitted under Decision A above .	<i>Project Implementation Unit</i>
E	INCIDENTS AND ACCIDENTS Promptly notify the Association of any incident or accident related to the Project that has, or is likely to have, a significant adverse effect on the environment, affected communities, the public, or workers, including, but not limited to, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents resulting in death, serious or multiple injuries, poisoning, violence, discrimination or protests, unexpected impacts on cultural heritage or biodiversity resources, pollution, dam breaks, forced labor or child labor, illegal displacements and forced evictions, pandemics. Provide sufficient detail on the scope, severity, and possible causes of the incident or accident, indicating the immediate measures taken or planned to address it, as well as any information provided by a contractor, as applicable. Arrange for an appropriate review of the incident or accident to establish its immediate, underlying and root causes. Prepare, agree with the Association, and implement a Corrective Action Plan that sets out the measures and actions to be taken to address the incident or accident and prevent its recurrence.	Notify the Association no later than 48 hours after becoming aware of the incident or accident. For SEA-SH related incidents, the survivor must be immediately referred to care services, and the PIU must immediately inform the Association ideally within 24 hours and in any case no later than 48 hours. Provide available details upon request. Provide review report and Corrective Action Plan to the Association no later than 10 days following the submission of the initial notice, unless a different timeframe is agreed to in writing by the Association.	<i>Project Implementation Unit</i>
ESS1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS a) Implement the E&S instruments updated to include the AF activities in accordance with the relevant ESS including: • The updated Environmental and Social Management Framework (ESMF) • The environmental and social instruments required by the ESMF, • The SEA/SH action plan • The Stakeholder Engagement Plan (SEP) , compatible with the relevant ESS. and ensure that such instruments are consistent with the applicable Environmental and Social Standards (ESSs) and are approved by the Association prior to their implementation b) Prepare, adopt, and implement environmental and social assessments of sub-projects in accordance with the relevant ESS defined in the ESF. Sub-projects on the exclusion list are ineligible for Project funding, such as: • Sub-projects that contradict national or regional development policy;	a) Implement the E&S instruments that were updated and disclosed on 18 June 2026, including the ESMF enclosing the SEA/SH Action Plan and the SEP throughout the project implementation. Any subsequent updates must be submitted to the Association for approval. b) Adopt the relevant sub-project instruments before the tendering process and before the execution of the relevant	

	• Sub-projects with high recurring costs; • Activities in progress or already planned as part of other projects or programs outside of the safety net program; • Sub-projects that do not meet the environmental and social eligibility requirements; • Large-scale projects (roads, bridges, etc.)	sub-project that requires such instruments, and then implement them throughout the implementation of the Project.	
1.2	MANAGEMENT OF CONTRACTORS a) Incorporate relevant aspects of the ESCP, including, but not limited to, relevant E&S instruments, workforce management procedures, and the code of conduct, into the EHS specifications of tender documents and contracts issued to contractors and supervisory firms. Subsequently, ensure that contractors and supervisory firms comply, and that subcontractors comply, with the EHS specifications of their respective contracts. Provide copies of the relevant contracts with contractors/subcontractors and supervision firms to the Association. b) Develop, submit for approval and implement the following procedures applicable to contractors, subcontractors and control companies: ESMP-Enterprise(ESMP-E) – site, health, safety and environmental (HSE) plan, environmental and social clauses, codes of conduct, Grievance Mechanism, social commitments on child labor and other elements provided for in the updated SEA-SH action plan included in the updated ESMF.	a) As part of the preparation of the respective procurement documents and contracts. Supervise contractors throughout the implementation of the initial project and the AF. Copies of relevant contracts provided to the Association upon request b) Develop, submit for approval before the start of the relevant work and implement them throughout the implementation period of the initial project and the AF	<i>Project Implementation Unit</i>
1.4	TECHNICAL ASSISTANCE Ensure that consulting, research (including feasibility studies), capacity building, training, and any other technical assistance activities within the Project are conducted in accordance with terms of reference acceptable to the Association, which is consistent with the ESS. Thereafter prepare and finalize the outputs of such activities in compliance with the terms of reference	Throughout the implementation of the initial project and the AF.	<i>Project Implementation Unit</i>

1.5	FUNDING FOR CONDITIONAL EMERGENCY INTERVENTIONS a) Ensure that the CERC Manual contains a description of the E&S assessment and management arrangement sin accordance with the ESS. b) Prepare and adopt any environmental and social instrument required under the CERC component, in accordance with the CERC-ESMF Annex, the CERC Manual and the ESS, and then implement the measures and actions required under said CERC E&S instruments, within the timeframes specified in said E&S instruments.	a) The preparation of the CERC Manual in form and substance acceptable to the Association is a withdrawal condition under Section III.B of Schedule 2 of the Agreements. b) In accordance with the timeframes specified in the CERC Manual	<i>Project Implementation Unit</i>
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	LABOR MANAGEMENT PROCEDURES a) Continue to implement the Labor Management Procedures (LMP) including, among other things, provisions on working conditions, management of relations with workers, occupational health and safety (including personal protective equipment, and emergency preparedness and response), the code of conduct (including with regard to SEA and SH), forced labor, child labor, grievance provisions for project workers and requirements applicable to contractors, subcontractors and monitoring firms. b) Ensure the signing of contracts, including the code of conduct, with all direct workers, contract workers and workers from key suppliers in accordance with the LMP, including the new employees for the new digital payment component	a) The LMP shall be implemented throughout the implementation of the initial project and AF. Any subsequent update to the LMP must be submitted to the Association for approval before implementation. b) Before hiring project workers and subsequently maintained throughout the implementation of the initial project and the AF.	<i>Project Implementation Unit</i>
2.2	OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES a) Continue to incorporate into the Project Implementation Manual and all signed contracts, including for PIU workers, the occupational health and safety measures contained in ESS2 and, where applicable, in the labor code and related national regulations in force, and as set out in the LMP. b) Maintain the section on emergency response management in the Project Implementation Manual and ensure that contractors prepare and implement an emergency preparedness and response plan and coordinate with related measures.	a) and b) Continue to implement the Initial Project Implementation Manual. Include the measures in the Tender Documents as part of the procurement process and in the contracts prior to signature. Any subsequent updates to this Project Implementation Manual must be submitted to the Association for approval before implementation. Once approved, the manual shall be kept up to date and implemented throughout the Project implementation.	<i>Project Implementation Unit</i>

2.3	GRIEVANCE MECHANISM FOR WORKERS Utilize the Grievance Mechanism (GM) for workers of the initial project, as described in the LMP and in accordance with ESS2.	Maintain the Grievance Mechanism (GM) continuously throughout the implementation of the initial project and the Additional Financing (AF).	<i>Project Implementation Unit</i>
ESS3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	WASTE MANAGEMENT PLAN Continue to implement a Waste Management Plan (WMP) and update it if new waste streams arise from AF activities, within the framework of the relevant instruments of the sub-projects, to manage hazardous and non-hazardous waste, in accordance with ESS3.	Continue to implement the WMP and update when necessary within the same timeframe as for the adoption and implementation of the sub-projects' ESMP, then implement the WMP throughout Project implementation.	<i>Project Implementation Unit</i>
3.2	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT Adopt and implement appropriate measures in the sub-projects ESMPs to effectively manage energy, water or raw materials.	During the preparation of the sub-projects environmental and social management plans (ESMPs), then implement the related measures throughout Project implementation.	<i>Project Implementation Unit</i>
3.3	PEST AND PESTICIDE MANAGEMENT Pesticide management plan have been prepared as part as the ESMF. Standardized mitigation measures to address pesticide management can be integrated into the section of the ESMP in accordance with ESS3.	Drafted as part as the ESMP. Any subsequent updates must be submitted to the Association for approval.	<i>Project Implementation Unit</i>
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	TRAFFIC AND ROAD SAFETY Incorporate risk management measures related to traffic and road safety, as required by the ESMPs to be prepared under action 1.2 above.	Same timetable as for the adoption and implementation of the ESMPs.	<i>Project Implementation Unit</i>
4.2	COMMUNITY HEALTH AND SAFETY Assess and manage specific risks and impacts to the community arising from Project activities, including, among other things, the behavior of Project workers, the spread of pandemic risks to the local population; security risks related to the handling of cash, responding to emergency situations, risks related to agricultural production, and include mitigation measures in the ESMPs to be prepared in accordance with the ESMPs.	Same timetable as for the adoption and implementation of the ESMPs.	<i>Project Implementation Unit</i>

4.3	SEA AND SH RISKS) Implement the updated SEA-SH action plan, which incorporates the additional risks introduced by the Additional Financing, including: (i) the risk of sexual harassment at civil works sites, a new activity involving mixed-gender worksites; (ii) the risks associated with the expansion of the Mother Leaders program into newly covered communities where accountability and the Grievance Mechanism has not yet been established; and (iii) the risk of third-party control over mobile payment accounts to the detriment of female beneficiaries, introduced by the digitalization of payments under the initial Project and the AF b) Integrate SEA-SH codes of conduct and prevention measures into contractual and procurement documents (Terms of Reference, Tender Documents, employment contracts).	a) The SEA-SH Action plan as part of the ESMF was updated and published on 18 June 2026. Any subsequent update to the SEA-SH action plan must be submitted to the Association for approval before implementation. Once approved, the SEA-SH action plan must be implemented throughout the initial project and AF implementation. b) During the preparation of procurement documents (Terms of Reference, Request for Proposals, worker contracts)	<i>Project Implementation Unit</i>
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	RESETTLEMENT POLICY FRAMEWORK Continue to implement the existing Resettlement Framework (RF) of the initial project, in accordance with ESS 5 and follow the current compensation rates, consider the updated geographical coverage, any new temporary and/or permanent physical and/or economic displacement, and any other relevant adjustments required by the AF.	The Resettlement Framework (RF) shall be implemented for the entire duration of the initial project and the AF. Any subsequent updates must be submitted to the Association for prior review and approval.	<i>Project Implementation Unit</i>

5.2	RESETTLEMENT PLANS a) Adopt and implement Resettlement Plans (RPs) and Livelihood Restoration Plans (LRPs), as required, for each sub-project, as outlined in the RF, and in accordance with ESS5 and in a manner satisfactory to the Association. b) Prepare and submit to the Association a monthly report on the progress of the implementation of the Resettlement Plan, and prepare and submit to the Association a report on the completion of the implementation of the Resettlement Plan	a) Adopt and implement the respective RP before the start of any activity which entails the need to acquire land and/or involuntary resettlement, including ensuring that, prior to taking possession of land and related property, full compensation has been provided and, where appropriate, that displaced persons have been resettled and that displacement allowances have been provided. b) Submit a monthly report on the progress of RP implementation before the first week of the month. Adopt the PR completion report before the end of the relevant PR.	<i>Project Implementation Unit</i>
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	BIODIVERSITY RISKS AND IMPACTS Adopt and implement mitigation measures to manage impacts on biodiversity in accordance with the measures described in the ESIA, ESMP and the provisions of ESS6, in a manner acceptable to the Association.	Same timetable as for the adoption and implementation of ESIA or ESMP.	<i>Project Implementation Unit</i>
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
Not relevant			
ESS 8: CULTURAL HERITAGE			
Not relevant			
ESS 9: FINANCIAL INTERMEDIARIES			
Not relevant			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			

10.1	STAKEHOLDER ENGAGEMENT PLAN Update, adopt and implement the Stakeholder Engagement Plan (SEP) for the Project integrating the new zones and new interventions under the AF, in accordance with ESS10, which includes measures to, among other things, provide stakeholders with timely, relevant, understandable and accessible information, and consult them in a culturally appropriate manner that is free from manipulation, interference, coercion, discrimination and intimidation.	The updated SEP was published on 18 June 2026. Implement the updated SEP throughout the implementation of the initial project and the AF. Any subsequent updates to the SEP must be submitted to the Association for approval. Once approved, the SEP must be published and implemented throughout the initial project and the AF.	<i>Project Implementation Unit</i>
10.2	PROJECT GRIEVANCE MECHANISM Continue to operate the existing Grievance Mechanism (GM), within the framework of the updated SEP, the updated ESMF and the RF, in order to receive, record and facilitate the processing and resolution of concerns and grievances related to the initial project and the AF, in a timely, efficient and transparent manner. This mechanism must be culturally appropriate, easily accessible to all project stakeholders, free of charge and without risk of reprisal, including for grievances filed anonymously, in accordance with the requirements of ESS10. The Grievance Mechanism must be equipped to receive, record and facilitate the resolution of SEA-SH complaints, including by referring survivors to relevant gender-based violence service providers, all in a safe, confidential and survivor-centered manner.	Maintain and operate the Grievance Mechanism throughout the implementation of the initial project and the AF. Any subsequent update to the GM must be submitted to the Association for approval before implementation. Once approved, the GM must be operational and monitored throughout the Project implementation.	<i>Project Implementation Unit</i>
INDICATORS FOR IMPLEMENTATION READINESS			
The following actions are indicators for implementation readiness: • Maintenance of the Project Implementation Unit (PIU) for the Shock Responsive and Resilient Social Safety Nets Project in the Comoros (P179291), with at a minimum one Environmental Specialist and one Social Specialist; • Updating and disclosure of E&S instruments, including the ESMF, incorporating the SEA/SH Action Plan and the SEP.			