Government of Comoros / Central Bank of Comoros (CBC)
Comoros Financial Sector Development Project (P166193)

ENVIRONMENTAL and SOCIAL COMMITMENT PLAN (ESCP)

Final - March 2020
ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Government of Comoros will implement the Financial Sector Development Project (the Project), with the involvement of the following: Project Implementation Unit (PIU) at the Central Bank of Comoros (CBC). The International Development Association (hereafter the Association) has agreed to provide financing for the Project.

2. The Government of Comoros will implement material measures and actions so that the Project is implemented in accordance with the Environmental and Social Standards (ESSs). This Environmental and Social Commitment Plan (ESCP) sets out material measures and actions, any specific documents or plans, as well as the timing for each of these.

3. The Government of Comoros will also comply with the provisions of any other E&S documents required under the ESF and referred to in this ESCP, such as Environmental and Social Management Plans (ESMP), and Stakeholder Engagement Plans (SEP), and the timelines specified in those E&S documents.

4. The Government of Comoros is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the Ministry, agency or unit referenced in 1. above.

5. Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the Association by Government of Comoros as required by the ESCP and the conditions of the legal agreement, and the Association will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.

6. As agreed by the Association and Government of Comoros, this ESCP may be revised from time to time during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to assessment of Project performance conducted under the ESCP itself. In such circumstances, Government of Comoros will agree to the changes with the Association and will update the ESCP to reflect such changes. Agreement on changes to the ESCP will be documented through the exchange of letters signed between the Association and the Government of Comoros. The Government of Comoros will promptly disclose the updated ESCP.

7. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, the Government of Comoros shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts.
### Summary of the concrete measures and actions to be implemented to mitigate the potential environmental and social risks and effects of the project

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#### MONITORING AND REPORTING PREPARATION

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**A** **REGULAR REPORTING:**
Prepare and submit to the Association regular monitoring reports on the implementation of (i) ESCP, (ii) environmental, social, health and security (ESHS) performance of the project, (iii) status of preparation and implementation of SEP, (iv) implementation of LMP, and (vi) functioning of the grievance mechanism(s)

**Bi-annual report starting Project effectiveness date and maintained throughout project implementation**

**Responsible Entity:** Project Management Unit (PMU)

**Responsible:** PMU Coordinator in collaboration with Environmental and Social Manager of the PMU

**Funding:** Project Funds

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**B** **INCIDENTS AND ACCIDENTS NOTIFICATION:**
Promptly notify the Association of any incident or accident related to the project or which has, or is likely to have an impact on it, and that has or could have a significant adverse effect on the affected communities, the public, or the workers included, but without any limit, any allegations of gender-based violence, work-related accidents or deaths related to the project, labor strikes and social unrest.

Provide enough detail regarding 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 supervising entity, as appropriate while ensuring confidentiality especially for GBV/SEAH related incidents. Subsequently, as per the Association request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.

**Inform the Association within 48 hours after becoming aware of the incident or accident, in accordance with the Association’s tool for responding to environmental and social incidents (World Bank Environment and Social Incidence Response Toolkit (ESIRT)).**

Any incident report should be notified in a time acceptable for the Association, as requested.

**Responsible Entity:** PMU

**Responsible:** PMU Coordinator

**Funding:** Project Funds

### SUMMARY OF ASSESSMENT

#### ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS

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**1.1 ORGANIZATIONAL STRUCTURE:**
Establish and maintain an organizational structure made up of qualified staff(s) in environment, social, and communication aspects in order to support the management of social risks. The environmental and social specialist will also ensure the engagement and mobilization of stakeholders.

The Union of the Comoros will mobilize the additional staff required for short- or long-term assignments in accordance with the assessment or with

**The environmental and social expert will be hired before effectiveness. The organizational structure will be maintained throughout Project implementation.**

**Additional staff or an environmental and social specialist will be hired twice a year before**

**Responsible Entity:** PMU

**Responsible:** PMU Coordinator

**Funding:** Project Funds
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| institutional needs, including specialists on the following topics: gender-based violence and sexual exploitation and abuse (GBV / SEA), working conditions (safety and health), and social inclusion. | launch of the activities which will be managed by the staff to be recruited and twice a year throughout project implementation. |

1.2 **ENVIRONMENTAL AND SOCIAL ASSESSMENT**
CBC will maintain an E&S due diligence and supervision on the rehabilitation of IT room and generator site in their premises under the Project, which will include at a minimum the following elements:

a. Applicable E&S requirements following the results of ESMP checklist and included E&S clauses in the bidding document before launching.
b. Incorporate the relevant aspects of the ESMP mitigation measures and the Labor Management Procedures and the ESHS specifications of the procurement documents with contractors. Thereafter, it will ensure that contractors comply with the ESHS specifications of their respective contracts.

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| An ESMP check list was developed prior to Appraisal. Prior to finalize civil works technical study to conduct ESMP check list assessment. | Responsible Entity: Central Bank of Comoros (CBC)
Responsible: PMU Coordinator
Funding: Project Funds |
| Prior to the preparation of the procurement documents, Supervise contractors/subcontractors throughout project implementation. | |

1.3 **NATIONAL PAYMENT COMMITTEE:**
Set up the system after promulgation by the Presidency of the Union of the Comoros of the decree appointing members, including representatives of local groups of women, of women entrepreneurs as well as civil society organizations from the 2 (two) islands to ensure that women and the entire population benefiting from the service are significantly represented in the consultation and implementation of the payment system.

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| 30 - 60 days at the latest after project effectiveness date. | Responsible Entity: Central Bank of Comoros (CBC)
Responsible: PMU Coordinator
Funding: Project Funds |
| Operational throughout project implementation. | |

1.4 **MANAGEMENT TOOLS AND INSTRUMENTS:**
Update, adopt, and implement the Environmental and Social risk management tools:
- Environmental and Social Commitment Plan (ESCP);
- Stakeholder Engagement Plan (SEP);
- Labor Management Plan (LMP);
- Code of conduct for workers, as part of LMP;
- Project and worker Grievance Mechanism, as part of LMP;
- Environmental and social screening tools (ESST) for the minor rehabilitation of the premises of the Central Bank of Comoros (CBC) to house IT equipment and materials.

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| ESCP, Draft SEP, Draft LMP and ESST submitted to the Bank for approval prior to project appraisal | Responsible Entity: PMU
Responsible: PMU Coordinator
Funding: Project Funds |
<p>| Final SEP and LMP to be submitted to the Bank prior to project effectiveness. Once approved, the instruments are carried out throughout Project implementation. | |</p>
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<tr>
<td><strong>1.5 MANAGEMENT OF SUPPLIERS AND SERVICE PROVIDERS:</strong> Incorporate relevant aspects of the SEP, including relevant documents and / or pertinent environmental and social screening tools for the minor rehabilitation of the premises of the Central Bank of Comoros (CBC) to house IT equipment and materials and worker management procedures, codes of conduct, into the environmental, social, health, and safety (ESHS) specifications of procurement documents with contractors. Ensure that contractors comply with the ESHS specifications of their respective contracts in a manner acceptable to the World Bank.</td>
<td>During the preparation of bidding documents. Supervise the firm throughout the implementation of the project.</td>
<td>Responsible Entity: PMU Responsible: Procurement team and Environmental and social team of the PMU Funding: Project Funds</td>
</tr>
<tr>
<td><strong>1.6 PERMITS, APPROVALS AND AUTHORIZATIONS:</strong> Develop and ensure validation by the Comorian authorities and by the World Bank of the environmental and social screening tools for the minor rehabilitation of the premises of the Central Bank of Comoros (CBC) to house IT equipment and materials</td>
<td>Before starting any activity requiring environmental and social filtration. Before recruiting firms.</td>
<td>Responsible Entity: PMU Responsible: Environmental and Social specialist of the PMU Funding: Project Funds</td>
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**ESS 2: LABOR AND WORKING CONDITION**

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<td><strong>2.1 LABOR MANAGEMENT PROCEDURES:</strong> (i) A first draft of the LMP (which include Code of conduct) has been prepared and submitted to the Association for approval prior to project appraisal. Finalize, adopt, and implement the Labor Management Procedures (LMP). (ii) Codes of Conduct including clauses and sanctions against the use of GBV/SEAH will be required for all workers, contractors and subcontractors and their workers. All staff will be required to attend information and awareness sessions on GBV/SEAH throughout project implementation. Induction sessions will be organized for temporary workers before they start work.</td>
<td>(i) LMP to be finalized prior to project effectiveness. Once approved, it will be maintained throughout Project implementation. (ii) Prior to engaging Project workers and contractors and maintained throughout Project implementation.</td>
<td>Responsible Entity: PMU Responsible: Human Resources Manager of the project in collaboration with the Environmental and Social Manager of the PMU Funding: Project Funds</td>
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<td><strong>2.2 GRIEVANCE MECHANISM FOR PROJECT WORKERS:</strong> Establish, maintain and operationalize a grievance mechanism for Project workers, as described in the LMP and in accordance with ESS2.</td>
<td>Operational mechanism to be established before recruiting project workers and to be implemented throughout project implementation</td>
<td>Responsible Entity: PMU Responsible: Environmental and social manager of the PMU in</td>
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<td>2.3 OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</td>
<td>Prior to engaging related activities and thereafter implemented throughout Project implementation.</td>
<td>Responsible Entity: Environmental and social team of the PMU. Responsible: Environmental and social manager of the PMU. Funding: Project Funds.</td>
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<td>Develop and implement occupational health and safety measures (OHS), when needed.</td>
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<td>2.4 PREPARATION AND RESPONSE TO EMERGENCY SITUATION:</td>
<td>Prior to engaging related activities and thereafter implemented throughout Project implementation.</td>
<td>Responsible Entity: Environmental and social team of the PMU. Responsible: Environmental and social manager of the PMU. Funding: Project Funds.</td>
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<td>As part of the OHS measures specified in section 2.3, include emergency preparedness and response systems. Ensure that workers and contractors are trained, and the plan is implemented.</td>
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<td>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</td>
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<td>3.1 RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT:</td>
<td>Prior to engaging related activities and thereafter implemented throughout Project implementation.</td>
<td>Responsible Entity: Environmental and social team of the PMU. Responsible: Environmental and social manager of the PMU. Funding: Project Funds.</td>
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<td>Measures for the rational use of resources and pollution prevention and management will be set out in the EMP check list. BCB will take appropriate mitigation measures to minimize the impact of the project on the environment and the natural resources, in accordance with ESS 3. Solid Waste Management Plan from civil works will be implemented by the enterprise. Conduct an energy audit and prepare an energy efficiency plan to address resource efficiency related to the operation of the data center.</td>
<td>Six months at the latest after project effectiveness date. Action plans adopted throughout project implementation.</td>
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<td>ESS 4: POPULATION HEALTH AND SAFETY</td>
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<td>4.1 <strong>RISKS OF GENDER-BASED VIOLENCE, EXPLOITATION AND SEXUAL ABUSE:</strong></td>
<td><strong>Submit the GBV sensitization Plan to the Association for approval during the first year of the project, and once approved, implementation throughout the Project implementation.</strong></td>
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</table>
| The project will prepare, adopt and implement GBV sensitization activities. | **Responsible Entity:** Environmental and social team of the PMU  
**Responsible:** Environmental and social manager of the PMU  
**Funding:** Project Funds |
| The project will ensure that the code of conduct is included into all bidding documents and all worker’s contracts. The project will ensure that GM related to GBV is operationalized for the project |                                                                                                                                 |

**ESS 5: ACQUISITION OF LAND, RESTRICTIONS ON THE USE OF LAND AND INVOLUNTARY RESETTLEMENT**

NOT RELEVANT

**ESS 6: PRESERVATION OF THE BIODIVERSITY AND SUSTAINABLE MANAGEMENT OF BIOLOGICAL NATURAL RESOURCES**

NOT RELEVANT

**ESS 7: INDIGENOUS PEOPLE/TRADITIONAL LOCAL COMMUNITIES OF SUB-SAHARAN AFRICA HISTORICALLY DISADVANTAGED**

NOT RELEVANT

**ESS 8: CULTURAL HERITAGE**

NOT RELEVANT

**ESS 9: FINANCIAL INTERMEDIATES**

NOT RELEVANT

**ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE**

NOT RELEVANT
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#### 10.1 PREPARATION AND IMPLEMENTATION OF THE STAKEHOLDER MOBILIZATION PLAN:

(i) Draft SEP has been submitted for prior review and approval of the Association prior to project appraisal. Finalize, adopt, and implement the Stakeholder Engagement Plan (SEP).

(ii) Update, adopt and implement the SEP and ensure that it is integrated into the project management system, and that sufficient staff and budget are allocated to its implementation.

(ii) Final SEP to be submitted the Association for prior review and approval prior to project effectiveness. Once approved, the SEP is carried out throughout Project implementation.

(ii) SEP to be updated periodically, as required, throughout the life of project.

**Responsible Entity:** Environmental and social team of the PMU

**Responsible:** Responsible of the environmental, social and communication aspects of the PMU

**Funding:** Project Funds

#### 10.2 PROJECT GRIEVANCE MECHANISM:

(i) Grievance Mechanism has been submitted for prior review and approval of the Association part of the draft SEP prior to project appraisal. Finalize, adopt, and implement the grievance mechanism (GM) as part of the SEP.

(ii) Adopt, update, maintain and operate a GM, as described in the SEP.

(i) Finalized prior to project effectiveness. Once approved, updated regularly throughout project implementation.

(ii) GM to be updated periodically, as required, throughout the life of project.

**Responsible Entity:** Environmental and social team of the PMU

**Responsible:** Responsible of the environmental, social and communication aspects of the PMU

**Funding:** Project Funds

#### 10.3 MOBILIZATION OF STAKEHOLDERS RELATED TO THE NATIONAL PAYMENT BOARD MOBILIZATION ACTIVITIES:

Hold regular consultations with women’s associations and regular consultations with civil societies in Anjouan and Mohéli islands. Initiate consultations upon request of the association.

Before the mobilization meetings of the National Payment Board

To be maintained throughout project implementation

**Responsible Entity:** Environmental and social team of the PMU

**Responsible:** PMU Coordinator

**Funding:** Project Funds

### CAPACITY SUPPORT (TRAINING)
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| **CS1** Organize training for communities in order to increase awareness of environmental and social risks and impacts and mitigation measures, including training on (non-exhaustive list):  
  - Stakeholder engagement  
  - Social review of sub-projects  
  - Environmental, Health and Safety for workers and for communities  
  - Emergency preparedness and response  
  - Mitigation of risks of gender-based violence  
  - Training on the inclusion of vulnerable and disadvantaged groups  
  - Complaints / grievances management as described under SEP  
  - Implementation, monitoring and reporting of compliance with workforce management procedures, etc.  
  - Awareness and prevention of transmitted diseases: HIV / AIDS / STD  
  - Awareness of GBV / SEA and child protection  
  - World Bank Environmental and Social Framework | Prior to commencement of relevant project activities and throughout project implementation. | Responsible Entity: Environmental and social team of the PMU  
Responsible: Responsible of the environmental, social and communication aspects of the PMU  
Funding: Project Funds |
| **CS2** Implement the training of Project workers in order to improve awareness of the risks and mitigate the impacts on the local communities concerned by the installation of ATM shelter infrastructure and merchant points, as defined in the GBV Action Plan. | Before the start of project activities and / or infrastructure construction works, and throughout the implementation of the project. | Entity in charge: Environmental and social team of the PMU  
Responsible: Responsible of the environmental, social and communication aspects of the PMU  
Funding: Project Funds |