



Union of Comoros
Contingent Emergency Response Project
[P509664]

ENVIRONMENTAL AND SOCIAL
COMMITMENT PLAN (ESCP)

Appraisal Version

March 2025

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Union of Comoros (the Borrower) will implement Contingent Emergency Response Project (the Project), with the involvement of the Ministry of Health; the Ministry of Land Management, Urban Planning and Land Transport; the Ministry of Finance; the National Commission for Solidarity, Social Protection and Gender Promotion; the Ministry of Agriculture and Fisheries; the General Directorate of Civil Security., as set out in the Financing Agreement (the Agreement). The International Development Association (the Association), has agreed to provide financing for the Project, as set out in Agreement.
2. The Borrower 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 Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the Agreement.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Borrower 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 Agreement, the Borrower shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.
4. As agreed by the Association and the Borrower, 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 Borrower agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Borrower's Representative specified in the Agreement. The Borrower shall promptly disclose the updated ESCP.
5. The subsection on "Indicators for Implementation Readiness" below identifies the actions and measures to be monitored to assess Project readiness to begin implementation in accordance with this ESCP. Nevertheless, all actions and measures in this ESCP shall be implemented as set out in the "Timeframe" column below irrespective of whether they are listed in the referred subsection.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT¹			
A	<p>ORGANIZATIONAL STRUCTURE</p> <p>a. Maintain a Project Management Unit (PMU) with qualified staff and resources to support management of environmental, social, health and safety (E&S) risks and impacts of the Project including an Environmental Specialist, a Social Specialist, a Gender Based Violence (GBV) specialist and an Occupational Health and Safety (OHS) Specialist.</p> <p>b. Implementing Agencies shall appoint or hire one environmental and one social specialist to manage identified E&S risks and impacts and an occupational health and safety specialist.</p>	<p>a. Maintain the PMU and these positions throughout Project implementation.</p> <p>b. E&S specialists appointed prior to start of activities and thereafter maintain the PMU and these positions throughout Project implementation.</p>	<p>a. PMU</p> <p>b. Ministry of Health; the Ministry of Finance; the National Commission for Solidarity, Social Protection and Gender Promotion; the Ministry of Agriculture and Fisheries; the General Directorate of Civil Security (Implementing Agencies)</p>
B	<p>CAPACITY BUILDING PLAN/MEASURES</p> <p>Prepare, submit to the Association and implement the capacity building plan based on the identified needs in terms of additional training for PMU staff, stakeholders, communities, Project workers on</p> <ul style="list-style-type: none"> • Environmental and Social Assessment; • Occupational health and safety, including the following points: Emergency prevention and preparedness; Emergency response arrangements; Incident reporting • Medical waste management; • GBV/SEA/SH; • Labour management; • Stakeholder Engagement. 	<p>Submit the capacity building plan 3 months after the CERP Activation Date and implement throughout the Project Implementation.</p>	<p>PMU</p>

¹ For all actions, consult with the country lawyer to ensure consistency with the legal agreement in cases where some actions need to be completed before the project becomes effective (effectiveness condition) or before certain disbursements can occur (disbursement condition).

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
MONITORING AND REPORTING			
C	<p>REGULAR REPORTING</p> <p>Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (E&S) performance of the Project. The reports shall include:</p> <ul style="list-style-type: none"> • Status of preparation and implementation of E&S documents required under the ESCP. • Documentation of stakeholder engagement activities carried out as per the Stakeholder Engagement Plan. • Complaints submitted to the grievance mechanism(s), the grievance log, and progress made in resolving them. • E&S performance of contractors and subcontractors as reported through monthly contractors' and supervision firms' reports. • Number and status of resolution of incidents and accidents reported under action E below. Any other aspects requested by the Association. 	<p>Submit quarterly reports to the Association throughout Project implementation, commencing after the CERP Activation Date. Submit each report to the Association no later than 15 days after the end of each reporting period.</p>	PMU
D	<p>CONTRACTORS' MONTHLY REPORTS</p> <p>If relevant, require contractors and supervising firms to provide monthly monitoring reports on E&S 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 OR as annexes to the reports to be submitted under action C above.</p>	PMU
E	<p>INCIDENTS AND ACCIDENTS</p> <p>Notify the Association of any incident or accident relating 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 those resulting in death or significant injury to workers or the public; acts of violence, discrimination or protest; unforeseen impacts to cultural heritage or biodiversity resources; pollution of the environment; forced or child labor; displacement without due process (forced eviction); allegations of sexual exploitation or abuse (SEA), or sexual harassment (SH); or disease outbreaks. Provide available details of the incident or accident to the Association upon request.</p> <p>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</p>	<p>Notify the Association no later than 48 hours after learning of the incident or accident. Provide available details upon request.</p> <p>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.</p>	PMU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	sets out the measures and actions to be taken to address the incident or accident and prevent its recurrence.		
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS</p> <p>a. Implement the Environmental and Social Management Plan (ESMP). The proposed activities described in the exclusion list set out in the ESMP shall be ineligible to receive financing under the Project.</p> <p>b. Incorporate the E&S provisions in the ESMP as part of the respective bidding documents for the respective Project activity prior to the carrying out of Project activity.</p> <p>c. Update to include new activities throughout the project implementation</p> <p>d.</p>	<p>a. Implement the ESMP throughout the project implementation.</p> <p>b. Incorporate E&S clauses in the respective bidding documents for the respective Project activity prior to the carrying out of Project activity. Once finalized, implement the respective ESMP throughout Project implementation.</p> <p>c. Update to ESMP including new activities prior to their implementation.</p>	PMU and Implementing Agencies
1.2	<p>MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the relevant aspects of the ESCP, including, inter alia, Environmental and Social Management Plan, Stakeholder Engagement Plan, the Labor Management Procedures, and code of conduct, into the E&S specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply and that they require their subcontractors to comply with the E&S specifications of their respective contracts. Provide copies of the relevant contracts with contractors/subcontractors and supervision firms to the Association.</p>	<p>As part of the preparation of procurement documents and respective contracts. Supervise contractors throughout Project implementation. Copies of relevant contracts provided to the Association upon request.</p>	PMU and Implementing Agencies
1.3	<p>TECHNICAL ASSISTANCE</p> <p>Carry out the consultancies, studies, capacity building, training, and any other technical assistance activities under the Project in accordance with terms of reference acceptable to the Association, that are consistent with the ESSs. Thereafter prepare and finalize the outputs of such activities in compliance with the terms of reference.</p>	<p>As part of the preparation of procurement documents and respective contracts.</p>	PMU and Implementing Agencies

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
		Supervise contractors and service providers throughout Project implementation. Copies of relevant contracts provided to the Association upon request.	
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	LABOR MANAGEMENT PROCEDURES Adopt and implement the Labor Management Procedures (LMP) for the Project as part of the Environmental and Social Management Plan (ESMP).	Same timeframe as in 1.1.	PMU and Implementing Agencies
2.2	OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN Prepare and implement an OHS Management measures as described in the ESMP to assess and manage the OHS risks and impacts of the Project. Require contractors and subcontractors to prepare and implement OHS Management Measures or Plan in accordance with the ESMP.	Same timeframe as in 1.1.	PMU and Implementing Agencies
2.3	GRIEVANCE MECHANISM FOR PROJECT WORKERS Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.	Establish grievance mechanism prior engaging Project workers and thereafter maintain and operate it throughout Project implementation.	PMU and Implementing Agencies
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	WASTE MANAGEMENT PLAN Adopt and implement An Infection Control and Medical Waste Management Plan (ICMWMP), Waste Management Plan (WMP), as part of the ESMP prepared for the Project, to manage hazardous and non-hazardous wastes, consistent with ESS3.	Same timeframe as in 1.1.	PMU and Implementing Agencies
3.2	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT Incorporate resource efficiency and pollution prevention and management measures in the ESMP to be prepared under action [XX] above.	Same timeframe as in 1.1.	PMU and Implementing Agencies
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 ESMP to be prepared under action 1.1. above.	Same timeframe as in 1.1.	PMU and Implementing Agencies
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, risks of labor influx, response to emergency situations, and include mitigation measures in the ESMP to be prepared.	Same timeframe as in 1.1.	PMU and Implementing Agencies

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
4.3	SEA AND SH RISKS Adopt and implement the SEA/SH Action Plan, as part of the ESMP , to assess and manage the risks of SEA and SH.	Same timeframe as in 1.1.	PMU and Implementing Agencies
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
NOT RELEVANT			
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
NOT RELEVANT			
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
NOT RELEVANT			
ESS 8: CULTURAL HERITAGE			
NOT RELEVANT			
ESS 9: FINANCIAL INTERMEDIARIES [This standard is only relevant for Projects involving Financial Intermediaries (FIs).]			
NOT RELEVANT			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN Prepare and implement a Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, which shall 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.	Prepare the SEP prior to Appraisal and thereafter implement the SEP throughout Project implementation.	PMU and Implementing Agencies
10.2	PROJECT GRIEVANCE MECHANISM Establish, publicize, maintain, and operate an accessible grievance mechanism, 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. 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.	Establish the grievance mechanism prior to the start of any CERP activities and thereafter maintain and operate the mechanism throughout Project implementation.	PMU and Implementing Agencies
INDICATORS FOR IMPLEMENTATION READINESS			
The following actions are indicators for implementation readiness:			
A: Ensure that implementing agencies have qualified staff and resources to support the management of environmental, social and health and safety (E&S) risks and impacts of the project.			
1.1: Implement the Project's final Environmental and Social Management Plan (ESMP) in accordance with the relevant ESS.			

