



**Union des Comores**

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**Ministry of Spatial Planning,  
Urban Planning, in charge of  
Land Affairs and Land  
Transport**

# **Regional Climate Resilience Program (RCRP)**

**P180171**

**Additional Financing**

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

**Negotiated version**

**April 30, 2025**

## **ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN**

1. The Government of Comoros (the Recipient is implementing the Regional Climate Resilience Project (RCRP-KM, with the participation of the Ministry of Spatial Planning, Urban Planning, Land Affairs and Land Transport as the Project Management Unit (PMU), with the participation, inter alia, of the Ministry of Finance, Budget and Banking, as set out in the Original and Additional Financing Agreements (the Agreements). The International Development Association (the Association) has agreed to provide the original financing and additional financing for the Project, as set out in Agreements. This current 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 (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Association. The ESCP is a part of the Agreements. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed 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 Minister of the Ministry of Land Development, Urban Planning, Responsible for Land Affairs and Land Transport. The Recipient 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 SUPPORT			
A	<p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>a. Maintain the current Project Implementation Unit (PIU) within the Ministry with qualified staff and resources to support management of ESHS risks and impacts of the Project including one existing Environmental Specialist, and one existing Social Specialist.</p> <p>b. Recruit one GBV Specialist to manage SEA/SH risks of AF activities. Establish and maintain one additional Environmental Specialist and one additional Social Specialist, with proven experience in E&amp;S compliance on works (such as with Post-Kenneth Recovery and Resilience Project), to support the management of the Project's increased level of effort anticipated under the AF regarding EHSS risks and impacts.</p>	<p>a. Maintain the PIU including two existing E&amp;S specialists throughout Project implementation.</p> <p>b. Additional GBV, Environmental and Social specialists to be hired no later than 60 days after the Effective Date of the AF, and thereafter maintain the positions throughout Project Implementation</p>	RCRP PIU
B	<p><b>CAPACITY BUILDING PLAN/MEASURES</b></p> <p>Prepare and implement the capacity building plan for the PIU and other relevant government or non-governmental agencies or private contractors implementing the project, possibly including the following themes:</p> <ul style="list-style-type: none"> <li>- Mapping and stakeholder engagement</li> <li>- Specific aspects of environmental and social assessment</li> <li>- Emergency Preparedness and Response</li> <li>- Community Health and Safety/Occupational Health and Safety</li> <li>- Incident Reporting</li> <li>- ESF, ESSs, and World Bank Group ESS Guidelines</li> <li>- Workers and community health and safety</li> <li>- Mitigation of GBV risks</li> <li>- Inclusion of vulnerable and disadvantaged groups in consultation processes</li> <li>- Grievance Mechanisms (GMs)</li> <li>- Development, implementation, monitoring and reporting in compliance with the LMP</li> <li>- Awareness and prevention of sexually transmitted infections: HIV/AIDS, etc.</li> <li>- Raising awareness on gender-based violence, sexual exploitation and abuse and sexual harassment (SEA/SH) and child protection</li> <li>- Raising awareness of measures to prevent the spread of Covid-19</li> </ul>	<p>Plan to be developed no later than 60 days after the Effective Date of the AF, and execution of plan throughout Project implementation.</p>	RCRP PIU
MONITORING AND REPORTING			
C	<b>REGULAR REPORTING</b>		RCRP PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>Prepare and submit to the Association regular monitoring reports on (i) the environmental and social, health and safety (EHSS) performance of the Project, including but not limited to the implementation (ii) of the methods for preparing and implementing the E&amp;S instruments required under the ESCP, (i) Stakeholder Engagement Activities (SEPs), (iv) Implementation of Labor Management Procedures (LMP), (v) Grievance Mechanism (GM) and (viii) GBV/EAS/HS Action Plan; (vi) Number and status of resolution of incidents and accidents reported under Action E below.</p> <p>These quarterly reports will be compiled and integrated into the annual progress report on project implementation analyzed and validated by the Project Steering Committee</p>	Submit quarterly reports to the Association throughout Project implementation, no later than 15 days after the end of each reporting period.	
D	<p><b>CONTRACTORS' MONTHLY REPORTS</b></p> <p>Require suppliers, contractors consulting engineers and supervising firms to provide monthly monitoring reports on E&amp;S performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the PIU. Share the reports with the Association upon request.</p>	Submit the contractor's monthly reports to the Association upon request and as an annex to the reports to be submitted under Action C above.	RCRP PIU
E	<p><b>INCIDENTS AND ACCIDENTS</b></p> <p>Promptly 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; dam failure; 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 sets out the measures and actions to be taken to address the incident or accident and prevent its recurrence.</p>	<p>Notify the Association no later than 48 hours after learning of the incident or accident (24 hours for SEA/SH incidents). 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> <p>This systematic notification system will be in force throughout the project.</p>	RCRP PIU
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			
1.1	<p><b>ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS</b></p> <p>1. Prepare, adopt and implement an Environmental and Social Management Framework (ESMF) for the Project, consistent with the relevant ESSs.</p> <p>2. Prepare and implement Environmental and Social Impact Assessment(s) (ESIA), and corresponding Environmental and Social Management Plan(s) (ESMP) for the specific construction and rehabilitation activities of component 2 once specific subproject sites are known, consistent with the relevant ESSs.</p>	<p>1. ESMF adopted and finalized no later than 60 days after Effective Date of the AF.</p> <p>2. Prepare and disclose the ESIA and subsequent ESMP prior to bidding process for works construction or rehabilitation activities. Thereafter implement the ESIA and ESMP throughout Project implementation.</p>	RCRP PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
		Any subsequent updates to the ESMF are subject to the approval of the association prior to implementation.	
1.2	<b>MANAGEMENT OF CONTRACTORS</b> Incorporate the relevant aspects of the ESCP, including, inter alia, the Labor Management Procedures, SEA/SH Action plan and code of conduct, grievance mechanisms, Contractor ESMP, etc. into the E&S specifications of the procurement documents and contracts with contractors, suppliers, 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.	As part of the preparation of procurement documents and respective contracts.  Supervise contractors throughout Project implementation. Copies of relevant contracts to be provided to the Association upon request.	RCRP PIU
1.3	<b>TECHNICAL ASSISTANCE</b> Ensure that consultancy, 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 (TOR) acceptable to the Association, that are consistent with the ESSs. Subsequently, ensure that the results of these activities are consistent with the mandate, thereafter, ensure preparation and finalization the outputs of such activities is in compliance with the terms of reference and consistent with ESSs.	Throughout Project implementation.	RCRP PIU
1.4	<b>CONTINGENT EMERGENCY RESPONSE FINANCING (CERC)</b> 1. Ensure that the Project's CERC Manual for Comoros includes a description of the E&S assessment and management arrangements, including if applicable, a CERC-ESMF that will be included or referred to in the CERC Manual for the implementation of the CERC component, in accordance with the ESSs.  2. Implement the E&S provisions of the CERC Manual, including, if applicable, the CERC-ESMF, and any assessments and plans required therein.	1. The preparation of the CERC manual and, if applicable, other E&S documents, as relevant, in form and substance acceptable to the Association is a withdrawal condition under Section of Schedule 2 of the Agreement. 2. In accordance with the timeframes specified in the CERC Manual, including, if applicable, the CERC-ESMF and any assessments and plans required therein.	RCRP PIU
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
2.1	<b>LABOR MANAGEMENT PROCEDURES</b> 1. Update the project's existing Labor Management Procedures (LMPs) for the Comoros Project to include the new activities to be carried out under the Additional Financing. This LMP includes provisions on working conditions, management of relations with workers, occupational health and safety (including personal protective equipment, and emergency preparedness and response), code of conduct (including the SEA and HS), forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms.	1. Revise and update the project's LMP no later than 60 days after the Effective Date of the AF and thereafter implement the LMP throughout Project implementation.	RCRP PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	2. Ensure signing of contracts, including the Code of Conduct, with all direct workers, contract workers and primary supplier workers are consistent with the LMP.	2. Prior to engaging any workers for AF activities.	
2.2	<p><b>OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN</b></p> <p>1. Prepare and implement OHS Management Plan to assess and manage the OHS risks and impacts of the Project, for inclusion in the Project Operations Manual.</p> <p>2. Incorporate OHS measures into the tender documents and all signed contracts, including for PMU workers, the OHS measures contained in the ESS2 and, where applicable, the Labor Code and related national regulations in force, and as set out in the LMP.</p> <p>3. Prepare and adopt an emergency response management section in the Project Operations Manual and ensure that contractors prepare and implement an emergency preparedness and response plan and coordinate with related actions.</p>	<p>1) and 2) Prepare the OHS Management Plan prior to contracting for works activities and thereafter implement the plan throughout Project implementation.</p> <p>3) During the preparation of Project Operations Manual and preparation of tender documents.</p> <p>Any subsequent updates to the Project Operations Manual shall be submitted to the Association for approval prior to implementation. Once approved, the manual must be kept up to date and implemented throughout the execution of the Project.</p>	RCRP PIU
2.3	<p><b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b></p> <p>Update and continue to operate a grievance mechanism for Project workers to include those working on new AF activities, as described in the LMP and consistent with ESS2.</p> <p>Ensure and verify that contracting companies, suppliers and service providers have a Worker GM or comply with the Project's worker GM.</p>	Update worker's grievance mechanism prior to engaging Project workers for AF activities and thereafter maintain and operate it throughout Project implementation.	RCRP PIU
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
3.1	<p><b>WASTE MANAGEMENT PLAN</b></p> <p>Prepare and implement a Waste Management Plan (WMP), as part of the ESIA/ESMP prepared for the Project's Component 2, to manage hazardous and non-hazardous wastes, consistent with ESS3.</p>	Same timeframe as for the preparation of the instruments in sections 1.1.1 and 1.1.2	RCRP PIU
3.2	<p><b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b></p> <p>Incorporate resource efficiency and pollution prevention and management measures in the ESIA/ESMP to be prepared under action 3.1 above.</p>	Same timeframe as for the preparation and implementation of the ESIA/ESMP in 1.1.2	RCRP PIU
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
4.1	<b>TRAFFIC AND ROAD SAFETY</b> Incorporate measures to manage traffic and road safety risks as required in the ESIA/ESMP to be prepared for AF-supported activities.	Same timeframe as for the preparation and implementation of the ESIA/ESMP in section 1.1.2. To be adopted and implemented throughout the life of the Project.	RCRP PIU
4.2	<b>COMMUNITY HEALTH AND SAFETY</b> Assess and manage specific risks and impacts to the Community arising from the Project's activities, including, but not limited to, the behavior of Project workers, the risks of COVID-19 or other infectious diseases that can spread to local populations; risks to personal safety, emergency response, and include mitigation measures in the ESMP to be prepared in accordance with the ESMF.	Throughout Project implementation	RCRP PIU
4.3	<b>SEA AND SH RISKS</b> 1. Prepare and implement an SEA/SH Action Plan to assess and manage the risks of SEA and SH, including a Code of Conduct to be signed by all workers, including the PIU staff.  2. Integrate SEA/SH codes of conduct and prevention measures into contract and procurement documents, including ToRs, tender documents and worker contracts	Prepare the SEA/SH Action Plan before no later than 60 days after Project Effective Date of the AF and thereafter implement the SEA/SH Action Plan throughout Project implementation. Any subsequent updates to the SEA/SH Action Plan shall be submitted to the Association for approval prior to implementation. 2. During the preparation of procurement documents (ToRs, tender documents, workers' contracts)	RCRP PIU
4.4	<b>SECURITY MANAGEMENT</b> Assess and implement measures to manage the security risks of the Project, including the risks of engaging security personnel to safeguard project workers, sites, assets, and activities [specify plans or include a reference to the instrument where such measures are reflected, as needed, as set out in the ESMP and guided by ESS4 and applicable law, with respect to the hiring, rules of conduct, training, equipment and supervision of such personnel.	Prior to beginning activities on the ground at sites requiring security management measures	RCRP PIU
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>			
5.1	<b>RESETTLEMENT FRAMEWORK and PLANS</b> 1. Prepare and implement a Resettlement Framework (RF) for the Project's proposed AF activities, consistent with ESS5.	1. RF to be adopted and finalized no later than 60 days after the Effective Date of the AF.  2. RP and LRP to be prepared and implemented after completion of technical studies and prior to carrying out the relevant works.	RCRP PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	2. Prepare and implement a Resettlement Plan (RP) and Livelihood Restoration Plan (LRP) for each project activity or site for which an RP and/or LRP is required, consistent with ESS5, including ensuring that before taking possession of the land and related assets, full compensation has been provided, displaced people have been resettled and moving allowances have been provided.		
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
6.1	<b>BIODIVERSITY RISKS AND IMPACTS</b> Ensure that (i) sub-project-specific environmental and social assessments take into account risks and impacts on biodiversity and include measures to manage these risks in ESIA/ESMPs, and (ii) these measures are implemented.	Same timeframe as for the preparation of the instruments in sections 1.1.1 and 1.1.2. Application of measures throughout the project implementation	RCRP PIU
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>			
<b>NOT RELEVANT FOR COMOROS</b>			
<b>ESS 8: CULTURAL HERITAGE</b>			
8.1	<b>CULTURAL HERITAGE RISKS AND IMPACTS, INCLUDING CHANCE FINDS PROCEDURES</b> Ensure that the relevance of tangible and intangible cultural heritage that may be affected by project activities is assessed and addressed in accordance with the guidelines of the ESMF and any ESIA and ESMP prepared for the Project, and consistent with ESS8. Describe and implement the chance finds procedures in ESIA/ESMPs in accordance with ESMF	Same timeframe as for the preparation of the instruments in sections 1.1.1 and 1.1.2. Application of measures throughout the project implementation	RCRP PIU
<b>ESS 9: FINANCIAL INTERMEDIARIES</b>			
<b>NOT RELEVANT FOR COMOROS</b>			
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<b>STAKEHOLDER ENGAGEMENT PLAN</b> Update and implement the Stakeholder Engagement Plan (SEP) for the Project to include consultations relevant to AF activities, 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.	Update the SEP no later than 30 days after Effective Date of the AF, thereafter, update the SEP on an annual basis and implement the SEP throughout Project implementation.	RCRP PIU
10.2	<b>PROJECT GRIEVANCE MECHANISM</b> Update, disclose and continue to operate an accessible grievance mechanism for Project stakeholders, 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.	Update the grievance mechanism no later than 30 days after the Effective Date of the AF and thereafter maintain and operate the mechanism throughout Project implementation.	RCRP PIU



MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	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.		
<b>INDICATORS FOR IMPLEMENTATION READINESS</b>			
<p>The following actions are indicators for implementation readiness:</p> <p>A. Availability of additional PIU staffing</p> <p>1.1. ESMF finalized and disclosed</p> <p>2.1, 2.2. LMP finalized and disclosed</p> <p>2.3. Preparation/Implementation of Worker GM</p> <p>5.1. RF finalized and disclosed</p> <p>10.1. SEP finalized and disclosed</p> <p>10.2 Project GM operational.</p>			