

**Union of Comoros**  
**Comoros Financial Sector Development Project**  
**(P166193)**

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

**NEGOTIATED VERSION - May 2020**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Union of Comoros (Recipient) 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 (BCC- Banque centrale des Comores). The International Development Association (hereafter the Association) has agreed to provide financing for the Project.
2. The Recipient 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 Recipient will also comply with the provisions of any other E&S documents required under the ESF and referred to in this ESCP, such as the Labor Management Procedures (LMP), and the Stakeholder Engagement Plan (SEP), and the timelines specified in those E&S documents.
4. The Recipient 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 the Recipient 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 Recipient, 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, the Recipient, through PIU Coordinator, 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 Recipient 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 Recipient 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		Timeframe	Responsible Entity/authority
<b>MONITORING AND REPORTING PREPARATION</b>			
A	<p><b>REGULAR REPORTING:</b> 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)</p>	<p><i>Bi-annual report starting Project effectiveness date and maintained throughout project implementation</i></p>	<p><b>Responsible Entity:</b> Project Implementation Unit (PIU) of BCC <b>Responsible:</b> PIU Coordinator in collaboration with Environmental and Social Manager of the PIU</p>
B	<p><b>INCIDENTS AND ACCIDENTS NOTIFICATION:</b> 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.</p>	<p><i>Notify the Association within 48 hours after becoming aware of the incident or accident.</i></p> <p><i>Any incident report should be sent promptly, in a time acceptable and agreed upon with the Association, as requested.</i></p>	<p><b>Responsible Entity:</b> PIU <b>Responsible:</b> PIU Coordinator</p>
<b>SUMMARY OF ASSESSMENT</b>			
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			
1.1	<p><b>ORGANIZATIONAL STRUCTURE:</b> 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.</p>	<p><i>The environmental and social specialist will be hired one month after effectiveness. The organizational structure will be maintained throughout Project implementation.</i></p>	<p><b>Responsible Entity:</b> PIU <b>Responsible:</b> PIU Coordinator</p>

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<p>Mobilize the additional staff required for short- or long-term assignments in accordance with the E&amp;S assessment or with institutional needs.</p>	<p><i>Additional staff will be hired before launch of the activities which will be managed by the staff to be recruited.</i></p>	
<p>1.2 <b>ENVIRONMENTAL AND SOCIAL ASSESSMENT</b>                      BCC will maintain an E&amp;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:</p> <ol style="list-style-type: none"> <li>a. Applicable E&amp;S requirements following the results of ESMP checklist and included E&amp;S clauses in the bidding document before launching.</li> <li>b. Incorporate the relevant aspects of the ESMP checklist mitigation measures and the Labor Management Procedures in the ESHS specifications of the procurement documents with contractors. Thereafter, it will ensure that contractors comply with the ESHS specifications of their respective contracts.</li> </ol>	<p><i>An ESMP check list was developed prior to Appraisal.</i></p> <p><i>During preparation of bidding document include applicable E&amp;S requirements following the results of ESMP checklist.</i></p> <p><i>Prior to completion of civil works, an audit will be conducted to confirm that works were carried out in line with the ESMP checklist and, if need, recommend remedial measures.</i></p> <p><i>Prior to the preparation of the procurement documents.</i>  <i>Supervise contractors/subcontractors throughout project implementation.</i></p>	<p><b>Responsible Entity:</b> Central Bank of Comoros (BCC)  <b>Responsible:</b> PIU Coordinator</p>
<p>1.3 <b>NATIONAL PAYMENT COMMITTEE:</b>                      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.</p>	<p><i>30 - 60 days at the latest after project effectiveness date.</i></p> <p><i>Operational throughout project implementation.</i></p>	<p><b>Responsible Entity:</b> Central Bank of Comoros (BCC)  <b>Responsible:</b> PIU Coordinator</p>
<p>1.4 <b>MANAGEMENT TOOLS AND INSTRUMENTS:</b>                      Update, adopt, and implement the Environmental and Social risk management tools:                      - Stakeholder Engagement Plan (SEP);                      - Labor Management Plan (LMP);                      - Code of conduct for workers, as part of LMP;</p>	<p><i>SEP, LMP and ESMP Check list have been submitted to the Bank and approved prior to project appraisal.</i></p> <p><i>Any update of SEP, LMP or ESMP Check list should be submitted to the Bank for approval</i></p>	<p><b>Responsible Entity:</b> PIU  <b>Responsible:</b> PIU Coordinator</p>

Summary of the concrete measures and actions to be implemented to mitigate the potential environmental and social risks and effects of the project	Timeframe	Responsible Entity/authority
<ul style="list-style-type: none"> <li>- Project and worker Grievance Mechanism, as part of LMP;</li> <li>- ESMP checklist (Environmental and social screening tools) for the minor rehabilitation of the premises of the Central Bank of Comoros (BCC) to house IT equipment and materials.</li> </ul>	<p><i>prior to implementation. Once approved, the instruments are carried out throughout Project implementation.</i></p>	
<p>1.5 <b>MANAGEMENT OF SUPPLIERS AND SERVICE PROVIDERS:</b>                      Incorporate relevant aspects of the SEP, including relevant documents and / or pertinent Environmental and Social Management Plan Check list (environmental and social screening tools) for the minor rehabilitation of the premises of the Central Bank of Comoros (BCC) 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 Association.</p>	<p><i>During the preparation of bidding documents.</i></p> <p><i>Supervise the firm throughout the implementation of the project.</i></p>	<p><b>Responsible Entity:</b> PIU  <b>Responsible:</b> Procurement team and Environmental and social team of the PIU</p>
<p><b>ESS 2: LABOR AND WORKING CONDITION</b></p>		
<p>2.1 <b>LABOR MANAGEMENT PROCEDURES:</b>                      (i) The LMP (which include Code of conduct) has been prepared and approved by the Association prior to project appraisal. Update, adopt, and Implement the Labor Management Procedures (LMP) in line with ESS2.</p> <p>(ii) Codes of Conduct including clauses and sanctions against the use of GBV/SEA-SH 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/SEA-SH throughout project implementation. Induction sessions will be organized for temporary workers before they start work.</p>	<p><i>(i) Any update of LMP should be submitted for approval to the Bank prior to implementation. Approved LMP will be maintained throughout Project implementation.</i></p> <p><i>(ii) Prior to engaging Project workers and contractors and maintained throughout Project implementation.</i></p>	<p><b>Responsible Entity:</b> PIU  <b>Responsible:</b> Human Resources Manager of the project in collaboration with the Environmental and Social Manager of the PIU</p>
<p>2.2 <b>GRIEVANCE MECHANISM FOR PROJECT WORKERS:</b>                      Establish, maintain and operationalize a grievance mechanism for Project workers, as described in the LMP and in accordance with ESS2.</p>	<p><i>Operational mechanism to be established before recruiting project workers and to be</i></p>	<p><b>Responsible Entity:</b> PIU  <b>Responsible:</b> Environmental and social manager of the PIU in</p>

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		<i>implemented throughout project implementation</i>	collaboration with Communication Manager of the PIU
2.3	<p><b>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</b> Develop and implement occupational health and safety measures (OHS), when needed, in line with the LMP and ESS2.</p>	<i>Prior to engaging construction or rehabilitation of targeted infrastructure and thereafter implemented throughout Project implementation.</i>	<p><b>Responsible Entity:</b> Environmental and social team of the PIU <b>Responsible:</b> Environmental and social manager of the PIU</p>
2.4	<p><b>PREPARATION AND RESPONSE TO EMERGENCY SITUATION:</b> 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.</p>	<i>Prior to engaging related activities and thereafter implemented throughout Project implementation.</i>	<p><b>Responsible Entity:</b> Environmental and social team of the PIU <b>Responsible:</b> Environmental and social manager of the PIU</p>
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
3.1	<p><b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT:</b> Measures for the rational use of resources and pollution prevention and management will be set out in the ESMP 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 Contractors.</p> <p>Conduct an energy audit and prepare an energy efficiency plan to address resource efficiency related to the operation of the data center.</p>	<p><i>Prior to engaging construction or rehabilitation of targeted infrastructure and thereafter implemented throughout Project implementation.</i></p> <p><i>Six months at the latest after project effectiveness date. Action plans adopted to be implemented throughout project implementation.</i></p>	<p><b>Responsible Entity:</b> Environmental and social team of the PIU <b>Responsible:</b> Environmental and social manager of the PIU</p>
<b>ESS 4: POPULATION HEALTH AND SAFETY</b>			

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<p>4.1 <b>RISKS OF GENDER-BASED VIOLENCE, EXPLOITATION AND SEXUAL ABUSE:</b>                      The project will prepare, adopt and implement GBV sensitization activities. 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</p>	<p>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.</p>	<p><b>Responsible Entity:</b> Environmental and social team of the PIU  <b>Responsible:</b> Environmental and social manager of the PIU</p>
<b>ESS 5: ACQUISITION OF LAND, RESTRICTIONS ON THE USE OF LAND AND INVOLUNTARY RESETTLEMENT</b>		
NOT RELEVANT		
<b>ESS 6: PRESERVATION OF THE BIODIVERSITY AND SUSTAINABLE MANAGEMENT OF BIOLOGICAL NATURAL RESOURCES</b>		
NOT RELEVANT		
<b>ESS 7: INDIGENOUS PEOPLE/TRADITIONAL LOCAL COMMUNITIES OF SUB-SAHARAN AFRICA HISTORICALLY DISADVANTAGED</b>		
NOT RELEVANT		
<b>ESS 8: CULTURAL HERITAGE</b>		
NOT RELEVANT		
<b>ESS 9: FINANCIAL INTERMEDIATES</b>		
NOT RELEVANT		
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>		

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10.1	<p><b>PREPARATION AND IMPLEMENTATION OF THE STAKEHOLDER MOBILIZATION PLAN:</b>                      Draft SEP has been consulted with stakeholders and, thereafter, revised prior to project appraisal. Final version has been approved by the Bank.                      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, in line with ESS10.</p>	<p><i>SEP to be updated periodically, as required, throughout the life of project. Any update of should be submitted for approval to the Bank prior to implementation. Once approved, the SEP is carried out throughout Project implementation.</i></p>	<p><b>Responsible Entity:</b> Environmental and social team of the PIU  <b>Responsible:</b> Responsible of the environmental, social and communication aspects of the PIU</p>
10.2	<p><b>PROJECT GRIEVANCE MECHANISM:</b>                      Establish, maintain and operate a GM, as described in the SEP, in line with ESS10.</p>	<p><i>(i) Established and operational prior to project effectiveness. Once operational, monitored and updated regularly throughout project implementation.                      (ii) GM to be updated periodically, as required, throughout the life of project.</i></p>	<p><b>Responsible Entity:</b> Environmental and social team of the PIU  <b>Responsible:</b> Responsible of the environmental, social and communication aspects of the PIU</p>
10.3	<p><b>MOBILIZATION OF STAKEHOLDERS RELATED TO THE NATIONAL PAYMENT BOARD MOBILIZATION ACTIVITIES:</b>                      Hold regular consultations with women's associations and regular consultations with civil societies in Anjouan and Mohéli islands, in line with ESS10.                      Initiate and hold additional consultations upon request of the Association, as needed.</p>	<p><i>Before the mobilization meetings of the National Payment Board                      To be maintained throughout project implementation</i></p>	<p><b>Responsible Entity:</b> Environmental and social team of the PIU  <b>Responsible:</b> PIU Coordinator</p>
<b>CAPACITY SUPPORT (TRAINING)</b>			



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CS1	<p>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):</p> <ul style="list-style-type: none"> <li>• Stakeholder engagement</li> <li>• Social review of sub-projects</li> <li>• Environmental, Health and Safety for workers and for communities</li> <li>• Emergency preparedness and response</li> <li>• Mitigation of risks of gender-based violence</li> <li>• Training on the inclusion of vulnerable and disadvantaged groups</li> <li>• Complaints / grievances management as described under SEP</li> <li>• Implementation, monitoring and reporting of compliance with workforce management procedures, etc.</li> <li>• Awareness and prevention of transmitted diseases: HIV / AIDS / STD</li> <li>• Awareness of GBV / SEA and child protection</li> <li>• World Bank Environmental and Social Framework</li> </ul>	<p><i>Prior to commencement of relevant project activities and throughout project implementation.</i></p>	<p><b>Responsible Entity:</b> Environmental and social team of the PIU  <b>Responsible:</b> Responsible of the environmental, social and communication aspects of the PIU</p>
CS2	<p>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 sensitization Action Plan.</p>	<p><i>Before the start of project activities and / or infrastructure construction works, and throughout the implementation of the project.</i></p>	<p><b>Responsible Entity:</b> Environmental and social team of the PIU  <b>Responsible:</b> Responsible of the environmental, social and communication aspects of the PIU</p>