



Concept Environmental and Social Review Summary

Concept Stage

(ESRS Concept Stage)

Date Prepared/Updated: 07/21/2022 | Report No: ESRSC02925



BASIC INFORMATION

A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
Comoros	EASTERN AND SOUTHERN AFRICA	P179109	
Project Name	Comoros Interisland Connectivity Project SOP2		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Transport	Investment Project Financing	10/31/2022	12/9/2022
Borrower(s)	Implementing Agency(ies)		
The Union of Comoros	Ministry of Maritime and Air Transport		

Proposed Development Objective

The Project Development Objective (PDO) is to improve maritime transport connectivity and safety between the islands.

Financing (in USD Million)	Amount
Total Project Cost	50.00

B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?

No

C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]

For small island states such as Comoros, transport infrastructure is of vital importance not only to be connected to the rest of the world, but also to enhance socioeconomic integration within the country. All three primary ports in Comoros have capacity constraints. Because of inefficient port operations and unreliable and unsafe transport services, the interisland connectivity has been declining in recent years, leaving the Comorian economy fragmented and causing chronic shortage of food and other consumer products in the islands, particularly Moheli, the poorest island of the archipelago. The country's climate vulnerability adds to sustainability and resilience challenges in the maritime transport sector. Port Boingoma in Moheli Island was damaged by Cyclone Kenneth. Because formal



maritime transport services are costly and unreliable, the informal interisland passenger market by small boats has been growing, leading to concerns about maritime transport safety.

Given limited available resources, the proposed operations take a programmatic approach. The SOP1 is primarily focused on the climate resilience of Port Boingoma through carrying out the design and construction of a breakwater along the quays. Building upon the approved SOP1 in May 2022, the proposed project (SOP2) aims at improving maritime transport connectivity between the islands by enhancing the port capacity of Port Boingoma and installing proper infrastructure at selected secondary ports. The SOP2 is also expected to support: (i) the expansion of the port capacity at Boingoma, including quays, superstructure and access roads, (ii) the development of minor infrastructure at landing sites (i.e., secondary ports) for safe passenger boat operations, and (iii) a new passenger boat program where several new and safer passenger boats are purchased as a pilot and operated among the secondary ports. On the institutional side, the SOP2 will also support project implementation and capacity building to improve maritime safety regulations and implement measures to increase women’s safety and personal security in the maritime transport sector.

D. Environmental and Social Overview

D.1. Detailed project location(s) and salient physical characteristics relevant to the E&S assessment [geographic, environmental, social]

The Comoros is an archipelago of three major islands composed by volcanic islands, Grande Comore, Moheli and Anjouan, located off the coast of Mozambique in the Indian Ocean. The proposed project aims to improve maritime transport connectivity and safety between the islands. The project will be implemented in all the three islands in Comoros – Boingoma Port (Fomboni area) on Moheli island and secondary ports Ouroveni in Grande Comore, and Vassy in Anjouan. These selected sites are in coastal zones with some sensitive ecosystems (coral reefs, spawning areas). Ouroveni and Vassi secondary port sites are composed of flat configuration. During the periods of new and full moon, differences of 3 to 4.9 m are recorded between high and low tides. Between the different islands, despite the presence of coral reefs, the bottom structure varies rapidly from 0 to 100m with favorable conditions for the navigation of boats of different sizes. The intact natural forest, humid evergreen occupies the heights of the reliefs. These forests, rich in endemic forms and varied habitats, are regressing under the action of agricultural activities. Mangroves or modified vegetation border the coastline. The fringing reefs dominate the beaches. Strong pressure on natural environments leads to a decrease in resources, degradation of ecosystems and the disappearance of certain species.

The Comoros has a population of about 830,000 with an estimated 40 percent of Comorians living below the national poverty line in 2014. Moheli is the most lagging-behind region in the country. While poverty incidence in Moroni and other parts of Grande Comores are relatively low at 30.7 percent and 32.7 percent, respectively, Moheli has the highest rate of 53.2 percent. Poverty in Anjouan is 38.2 percent. Society is matrilineal, and women have access to property according to custom and law. However, women do not always have the right to use their property rights. The traditional system tends to exclude women from formal decision-making processes. Men hold the heads of villages positions. About 38 percent of the working-age adults have their main job in agriculture and 29 percent are employed in the service sector, while employment in industry or manufacturing and trade is relatively low. Less-educated workers are generally concentrated in agricultural employment, and to a lesser extent trade, while those with superior education are engaged in the service sector. The participation in the labor market and the nature of employment is characterized by some gender discrepancies. Only one-third of women are part of the workforce,



compared to a participation rate of 57 percent for men. Fishing is mainly artisanal, and many fishers still use traditional wooden canoes. However, small motorized fiberglass boats have been introduced into artisanal fishing. While Grande Comores and Anjouan are relatively well connected by formal ferries and large freight vessels, Moheli, the poorest island, is most isolated. Local travelers mainly use small “informal” boats among beaches (“secondary ports”) to meet the daily transport needs as available formal maritime transport services are limited. Local people rely on efficient but unsafe small boats (i.e., kwassa kwassa) for their daily transportation between the islands. For safety reasons, the Government prohibits passenger operations by kwassa kwassa. However, the policy is not strongly enforced because there is no alternative transport means to meet the time-elastic needs for local communities. It is estimated that, about 136,000 passengers cross the Indian Ocean per year by kwassa kwassa. The safety records received from the National Agency of Maritime Affairs (ANAM) show that on average 4-7 incidents involving kwassa kwassa were recorded annually.

D. 2. Borrower’s Institutional Capacity

A Social Specialist, an Environmental Specialist and a GBV/SEA/SH Specialist have been recruited by the project to oversee the implementation of risk management aspects under SOP 1 and SOP 2. The Project will be managed by a project implementation unit (PIU) created under the Ministry of Maritime and Air Transport (Ministère des Transports Maritime et Aérien, Chargé du Tourisme et de l’Artisanat), which is responsible for implementing all maritime transport policies in Comoros, including port regulations and PPP supervision. During the SOP1, capacity building assessment was conducted for the PIU and all port sector stakeholders to ensure the implementation of environmental and social measures and the monitoring of the activities themselves. As recommended under the ESIA for Boingoma Port and ESMF for the secondary Port, Ministry of Transport will implement an Environmental and Social Management System (ESMS) for operation of the Boingoma Port which includes measures for managing risks and impacts related to the operational phase. Further, technical support requirements have also been identified for the operational phase. These entities are not yet familiar with the WB's operations or with the ESF. The ESMF for the Secondary Ports and ESIA for Boingoma Port have identified the relevant E&S capacity building described in the ESCP. The First ESF training session has been conducted by the WB team to the new recruited E&S specialists in the PIU team. The PIU will cooperate closely with the SCP (Société Comorienne des Ports) for ports technical operation, the ANAM (Association Nationale des Affaires Maritimes) as the public organizations in charge of administrative actions related to hydrographic activities and other key actors involved in project preparation and implementation such as the Ministry of Environment, the RENAP (Réseau National des Aires Protégées).

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II. SCREENING OF POTENTIAL ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC) High

Environmental Risk Rating High

The environment risk is assessed High. The proposed project (SOP2) aims at improving maritime transport connectivity between the islands by enhancing the port capacity of Port Boingoma and installing proper infrastructure at selected secondary ports. The SOP2 components are a continuity and complementarity of the SOP 1 activities at Port Boingoma which focused on the construction of a breakwater along the quays. The Boingoma Port ESIA and ESMF, prepared and approved in January 2022 under SOP1, assessed potential adverse risks and impacts of proposed SOP2 activities. Key findings relevant to environmental risks and impacts related to the improvement of the existing Boingoma Port infrastructure in Moheli island and secondary Ports in the three islands include perturbation of marine habitat and potential damage to marine biotopes during dredging; port waste and pollution control, pollution from



the dredged material; occupational and community health & safety issues and potential increase in road or traffic-related accidents especially during construction and transportation of dredged material. The infrastructure improvement in the Boingoma Port will likely involve heavy civil works, with noise, vibration, dust, traffic, and possible community safety concerns. Although only limited amounts of dredging are required and the fact that the dredging material is not contaminated as per laboratory analysis, the improper management of such material can cause turbidity, affecting the marine habitat. The biological inventory of the port area did not identify the existence of sensitive species in the IUCN red list or coral beds, but the port site is in the protected area of Moheli. Potential quarry sites (selected stones and soil) studies are ongoing. These activities could generate occupational and community health & safety issues and potential increase in road or traffic-related accidents especially during construction and transportation with noise, vibration, dust, traffic, and possible community safety concerns. During the operation of the port and improved landing sites, environmental risks may include storm-water runoff, handling or storage of hazardous cargo and its movement through populated areas, health, safety and security issues in the Port areas. Limited country capacity is a contributing factor to support a high rating for environmental risks.

Social Risk Rating

Substantial

The Social Risk is assessed as “substantial”. Project impacts are mainly small scale and can be mitigated. For infrastructure building and port improvements an ESIA (for Port Boingoma), a Resettlement Policy Framework (RPF) and an ESMF were prepared under SOP1. These instruments indicate that there is little, if any, land taking involved in the port areas. The areas occupied by ports belong to the Government which will be verified and confirmed during screening for ESMPs. This will also provide information on land use and existing claims, if any. If required, a Resettlement Action Plan will be prepared for each port. However, construction will require land for borrow pits and access roads. This will require the preparation of Resettlement Action Plans guided by the Resettlement Policy Framework prepared for the project. Economic impacts may also take place as crop losses and other livelihood losses are expected. These would require the preparation of RAPs/Compensation Plans or Livelihood Restoration Plans (LRP) where required. The Vessel renewal program has been taken out from SOP1 and included under SOP2 with a narrower scope. Under SOP2, this subcomponent (pilot program of new passenger boats) does not intend to replace the kwassa kwassa fleet but aims at demonstrating socioeconomic benefits from safer and more reliable maritime passenger services by commissioning 2 to 4 boats. Even if the number of boats to be commissioned is low, and the magnitude of these potential impacts is considered to be low, the commissioning of these boats may have an economic impact on Kwasa Kwasa Operators. The ESMF prepared under SOP1 will be updated for SOP2 to ensure that guidance and procedures for a detailed assessment are included. This assessment will identify if a Livelihood Restoration Plan (LRP) will need to be prepared and implemented to ensure that livelihood impacts faced by operators are mitigated. If an LRP is required, it will be developed, reviewed, approved and implemented before the implementation of the program. Infrastructure building and port improvements will use labor for construction activities. While most labor is expected to be drawn from local areas, there will be some influx of labor for civil works. Further, the risk of poor working conditions that are not in line with ESS 2 and Comorian labor laws also requires mitigation measures. Risks related to labor also include use of child labor, forced/bonded labor and discrimination in employment unless specific measures are in place to check these practices. Another risk related to infrastructure building and port improvements is related to community health and safety during infrastructure construction through increased traffic, movement of machinery and materials etc. This can lead to impacts on health through emissions, increased noise and road accidents. The ESMF for secondary ports and ESIA for Port Boingoma prepared at SOP 1 Appraisal stage include guidance on traffic management and managing the spread of infectious diseases including COVID-19. The risk of GBV/SEA/SH was assessed as substantial mainly as a result of labor influx. The risk of conflicts with communities and lack of awareness about the project will also need to be addressed as this can create resentment among local

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residents. Illiterate, poor, disabled and marginalized groups (e.g women) can be left out of consultations unless consultations are specifically designed to include such groups. The Stakeholder Engagement Plan prepared under SOP 1 includes an assessment of stakeholders according to their influence and impact and outlines measures for consulting them during the various stages of implementation. During the SOP1 preparation stage, consultations were undertaken with a range of stakeholders including women, fishermen, local residents. Such consultations will continue to take place during implementation.

B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:

ESS1 is assessed as relevant. The Project is likely to generate a wide range of significant adverse risks and impacts on human populations or the environment because of the complex nature of the Project and environmental context. Long term, permanent and irreversible impacts due to the nature of Project activities are anticipated.

A standalone ESIA/ESMP for the port of Boingoma and an ESMF for the construction of secondary ports were prepared by the client, both on December 2021, for the programmatic approach including SOP 1 and SOP2. Following the project design and the social and environmental profile from ESMF and ESIA, the potential risks and impacts are related to the following: (i.) Land acquisition required to the construction area, (ii.) Environmental pollution (soil, air, noise) related to water turbidity, demolition, dredging operation, accidental spills, solid waste and effluent, concrete laitance, exhaust gas, noise and vibration, asbestos contaminated materials (from demolition of existing structures), sludge generation by the dredging and the demolition operations ...etc, (iii.) Road degradation due to equipment and construction materials transportation, (iv.) Loss of marine habitat/resources, (v.) Pressure and competition on drinking water resources due to the needs of the construction site, (vi.) Community health and safety such as risks related to Gender Based Violence (GBV) and Sexual Exploitation and Abuse (SEA) and spread of infectious diseases, accidents, and road safety during construction phase, (vii.) Potential labor influx into the project area during construction owing to opportunistic settlements and migrant workers seeking employment, (viii.) Navigation disruption and related accident risks within the fairway and the turning circle, (ix.) Change in the current and sedimentation dynamics due to the embankment and the breakwater construction, (x.) Exposure of construction site staff and residents to COVID-19 and other diseases IST/AIDS, (xi.) Pressure on the quarries and borrow pits for raw construction materials. A supplementary ESIA for quarries must be prepared, for which the PIU has already identified several potential sites. Since the overall ESIA was already approved and disclosed, the supplementary assessment for quarries can be prepared and attached to the ESIA at least before the actual work is commenced (i.e., disbursement condition).

The ESMF for SOP1 has concluded that a standalone ESIA will be prepared when the technical studies of secondary ports available on basis of E&S ToR approved by the Bank and the ESIA with its ESMP should be approved by the Bank and disclosed in the country before launching of secondary port Bidding documents. The approved ESIA with its ESMP and Environmental and social mitigation measures will be captured in Contractor Environmental and Social Management Plan (C-ESMP) during the construction phases and operational secondary port ESMS. The government identified 2 priority sites for secondary ports: Vassy and Ouroveni. Vassy was included in the original ESMF, but Ouroveni is new, which is 5-10 minutes away from Chindini. It is in the same area but located at the other side of the



cape. It is considered to be better because of more modest waves. The ESMF will be updated to include Ouroveni E&S profile.

The ESIA for Boingoma (Fomboni) SOP 1 phase defines mitigation measures for construction and operational phases, roles and responsibilities, time plans, costs and implementation procedures for each mitigation measure recommended. A marine biodiversity assessment has been conducted as part of the ESIA prepared for Boingoma port under SOP 1, which concluded that the marine ecosystem is composed of modified habitat. The risks and impacts could be reduced at acceptable level by using of dredging technologies and protective screens to limit the dispersion of resuspended particles and materials. It was recommended to develop a coral reef restoration plan in collaboration with the forestry services before launching of works.

The ESIA also provides assessment and guidance on managing community health and safety risks related to GBV and COVID-19, management of labor and GRM. For the borrow pits, an ESIA/ESMP will be prepared by the PIU and reviewed and approved by the World Bank and disclosed before the launching of the bidding process for the construction of Port Boingoma. Borrow pit sites will be screened as part of the borrow pits ESIA, and if required, a RAP will be prepared and implemented before the beginning of works and taking of any lands. Before the start of civil works, the contractor will prepare the Contractor Environmental and Social Management Plan (C-ESMP) for the construction of Port Boingoma and the C-ESMP for the selected quarry sites. These instruments will be submitted for the World Bank's approval. The project susceptibility to climate change related hazards, such as sea level rise, erosion, flooding has been assessed and the port rehabilitation design and civil works have considered specific measures to manage and reduce the risks to include in the C-ESMP and ESMS for the Port Authority.

The ESMF for secondary ports under the SOP2 also includes Labor Management Procedures and a SEA/GBV/SH Risk Assessment and Action Plan. The ESMF recommends to develop a standalone ESIA for each secondary port in parallel to technical studies. Prior to the commencement of civil works and taking of any land, each port to be rehabilitated will develop and implement a Resettlement Action Plan (RAP) in line with the Resettlement Policy Framework (RPF) prepared for the Program (SOP1 and SOP2), as required. Construction Contractors will be required, as a condition of their contracts, to develop, implement and comply with the C-ESMP, that will include all necessary specific management plans and procedures provided in the ESIA/ESMF.

During the SOP 1 preparation, the ESIA for the port of Boingoma (Fomboni) and the ESMF for the secondary port have been disclosed in the country on January 18, 2022 and to External WB website on January 20, 2022 and the remaining ESF instruments (RPF-LMP-SEP, including GRM-ESCP) have been consulted and were disclosed prior to the SOP1 Appraisal, both in-country and on the Bank's website. These ESF documents (ESIA -ESMF – RPF – LMP -SEP and GBV action plan) will be reviewed and redisclosed before SOP2 appraisal stage.

Under SOP2, the pilot program of new passenger boats does not intend to replace the kwassa kwassa fleet but aims at demonstrating socioeconomic benefits from safer and more reliable maritime passenger services by commissioning 2 to 4 boats. The implementation of this program is not expected to create economic impact on the Kwasa Kwasa Operators; however, these cannot be ruled out. The ESMF prepared under SOP1 will be updated for SOP2, to ensure that a detailed assessment is undertaken to identify if an LRP will need to be developed so that livelihood impacts faced by operators are mitigated before the implementation of this component.

Prior to the operation phase, the Ministry of Maritime and Air Transport will be expected to develop and implement an ESMS for the operation of the Boingoma (Fombini) Port and the two secondary Ports. This ESMS will include measures for managing risks and impacts related to the operational phase consistent with ISO 14001 and ISO 45001 standards, and a GRM for all stakeholders during the operation phase.



The study indicates that the potential private sector contribution to capital investment may be limited due to the small size of Port Boingoma. If any additional donors could join to contribute to Port infrastructure construction, all ESF principle and requirement will be applied on all project components.

The ESMF will be updated to cover the CERC Component while carrying the technical studies, to screen and propose mitigation measures related to implementing emergency activities in case the CERC component is activated.

Areas where “Use of Borrower Framework” is being considered:

The use of Borrower Framework will not be considered for this project in whole or in part.

ESS10 Stakeholder Engagement and Information Disclosure

ESS 10 is assessed as relevant. A Stakeholder Engagement Plan (SEP) has been developed for the program during SOP1 preparation, which will guide the consultation processes and stakeholder engagement throughout the life cycle of the project, starting from preparation down to implementation. During the ESIA exercise, stakeholder mapping has been conducted and identified stakeholders in the different project intervening zones. Potential stakeholders are Ministry of Maritime and Air Transport, boat operators, commercial users of Boingoma port, coastal communities, travelers and service providers for travelers and port operations. Given that the Boingoma port is located within the protected area of Moheli, the RENAP must be involved in the stakeholder engagement process. Stakeholder mapping has also analyzed the influence of these stakeholders to the project design and implementation and the project's impacts on them. Special attention will be given to inclusion of women, vulnerable and project affected people, as well as other interested groups. Based on stakeholder mapping, the Borrower has prepared Stakeholder Engagement Plan (SEP) which included a detailed schedule of planned engagement activities for the various stakeholders during the project cycle and will specify format and frequency of these engagements. The SEP will ensure all consultations are inclusive and accessible. It will include a Grievance Redress Mechanism. Labor Management Plans will also outline a labor GRM for implementation. The SEP has been prepared and disclosed prior to the SOP 1 appraisal. This document will be reviewed, updated as required and redisclosed for this SOP2.

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B.2. Specific Risks and Impacts

A brief description of the potential environmental and social risks and impacts relevant to the Project.

ESS2 Labor and Working Conditions

ESS2 is assessed as relevant. The proposed program (SOP1 – SOP2) will involve direct workers, contracted workers and primary supply workers. Labor/contracted workers during construction are expected to be employed by the project. In Comoros where overseas migration to find work is rampant, labor requirements are often supplied from outside the project areas.

Labor Management Procedures (LMPs) have been outlined in the ESIA. The Project Implementation Unit (PIU) includes 17 workers which will include contracted and direct workers. The due diligence of Boingoma port estimated an amount of 150 workers for construction and supervision contractors. A Workers Camp Management Plan will be elaborated as part of the C-ESMP for Boingoma port and reviewed and approved by the Bank before the beginning of works.



The information related to the number of workers for secondary ports will be provided and analyzed in the standalone ESIA to these ports. The LMP elaborated under SOP1 contains the requirements and guidance to develop Workers Management Camps. The PIU is also expected to contract consultants for specialist studies. No community workers will be employed by the project. The project will also use primary supply workers. These will be employed by parties expected to provide material to the project such as construction material, suppliers of trucks for port construction sites and other services etc.

The LMP prepared under SOP1 for the program includes an assessment of labor related risks for direct and contract workers such as those related to working conditions, Occupational Health and Safety, inequality and discrimination and provides guidance on their mitigation. These risks include inadequate and inappropriate working conditions for workers which are not aligned with local legislation and ESS2, discrimination, inequality of opportunity, violence (particularly SEA/GBV/SH), child and forced labor, inappropriate health and safety conditions, and denial of right for workers to organize. Labour risks related to other categories of workers were as well taken into consideration in the LMP.

The PIU will be responsible for the overseeing measures related to labor management and working conditions. The PIU will hire one or more staff directly responsible to undertake the overall implementation of the Project in compliance with the provisions on labor and working conditions; ensure that contractors prepare their work management procedures which comply with the LMP and the Contractor's ESMP before the work commences, ensure that contractors/ sub-contractors respect their obligations towards contract workers, ensure that the potential risks of child labor, forced labor and serious safety concerns for primary supply workers are addressed, monitor the training of workers affected by the project; ensure that the complaints mechanism for project workers and PIU is established and implemented and that procedures are in place for workers to sign the Code of Conduct for Workers and any other measures aimed at addressing the risks of sexual exploitation and abuse (SEA) / sexual harassment (SH). The Supervision Engineer will also employ staff to monitor the implementation of labor related measures on behalf of the PIU. Construction companies will be responsible for appointing specialists to manage labor, occupational health and safety issues. They will include measures related to health and safety and labor in their Construction ESMPs which will be approved before civil works. Contractors will also oversee the adherence of their subcontractors to the LMP, maintain records of recruitment and employment of contract workers (including subcontractors) with age verification to avoid child labor, provide induction and regular training to contract workers on environmental, social, occupational health and safety issues, require primary suppliers to identify and address the risks of child labor, forced labor, and serious safety concerns, as well as the risks of equity and discrimination. Contractors will also develop and implement a Grievance Redress Mechanism (GRM) for contract workers, ensure that all contractor and subcontractor workers understand and sign the Code of Conduct before work begins and take all other measures to deal with the risks of sexual exploitation and abuse (SEA) / sexual harassment (SH).

To ensure Health and Safety (H&S) of workers during the construction and operational phases of the project, the project will require contractors to prepare and implement their Occupational Health & Safety Plan (OHSP) following the World Bank Group Environment, Health and Safety (EHS) Guidelines (for construction activities) and Industry Sector Guidelines for Construction Materials Extraction. The OHSP will also include procedures on incident investigation and reporting, recording and reporting of non-conformance, emergency preparedness and response procedures and on-going worker training/awareness. A SEA/SH Action Plan will also be in place to mitigate and



manage workplace SEA/SH risks. The current LMP prepared under SOP1 for the program will be reviewed and redisclosed before SOP2 appraisal stage.

ESS3 Resource Efficiency and Pollution Prevention and Management

ESS3 is assessed as relevant. During the SOP1 preparation for the Program, dredging and rehabilitation of Boingoma Port and the two secondary Ports in the Islands could generate pollution from the construction materials, disturb the marine habitat and cause potential damage to marine ecosystem. Analysis conducted as part of the ESIA prepared for Bongonia Port, concluded that the material subject to dredging is not contaminated with heavy metals and hazardous substances. Disposal options for the dredged material were identified and evaluated in accordance with ESS3. It was retained for the port civil works design that the dock is used for storage of the dredging and de-rocking materials. A Dredging Management Plan has been prepared to minimize the impacts on the water quality and marine habitats. This plan is expected to be as an Annex to the upcoming C-ESMP. For Boingoma port, it is expected up to 10 500 m3 of dredged materials. These materials are likely to be reused for construction projects at the Island. However, an onshore dumping site, combined to a mechanical and/or physico-chemical dehydration processes are planned to appropriately manage the dredged materials.

Construction of temporary worker camps for the construction/rehabilitation of ports are also activities expected to generate pollution. The implementation of mitigation measures such management plans for construction materials will be applied to reduce and minimize the impact of contamination and pollution to marine and terrestrial areas during construction, and residual impacts are expected to be limited in scope and duration.

During construction phase, air emissions will include exhaust from heavy vehicles and machinery, and fugitive dust generated by construction activities. Those most likely to be affected are workers on site and people living within the proximity of the construction sites. The implementation of mitigation measures such as dust suppression and vehicle maintenance will be applied to minimize the impact of air emissions during construction, and residual impacts are expected to be limited in scope and duration.

For the Boingoma port expansion under SOP 1 and the 2 secondary ports under SOP 2, construction activities will generate solid and liquid waste which will primarily include excavated soil and hazardous waste such as hydrocarbon oils from construction machinery and vehicles. The waste generated by the construction works will largely be disposed of at approved sites according with the national laws and regulations. During the operation of the port and improved landing sites, environmental risks may include storm-water runoff and handling or storage of hazardous cargo. Specific Waste Management Plans shall be developed for Boingoma port and the secondary ports, respectively in the C-ESMP before launching civil works.

The site-specific ESIA/ESMPs for Boingoma Port and each secondary Port, as recommended in the ESMF prepared under SOP 1 for the program, will manage risks relevant to this standard during preparation, construction, and Project susceptibility to Climate change related hazards, such as sea level rise, erosion, flooding have been assessed. The port rehabilitation design and civil works have considered specific measures to manage climate hazard risks. The ESMS should develop natural risk preparedness plan before port operation phase.

During construction, the greenhouse gas emissions generated by the project are expected to be not substantial given the rehabilitation nature of the works. During operation, the proposed project is expected to contribute to the reduction of greenhouse gas emissions through the reduction of vessel fuel consumption intensity, resulting from the improved operational capacity of Boingoma port, which will allow a wider range of ships and better utilization, reducing emissions per unit of freight-carriage, the more efficient cargo transportation among the islands due to the adoption of larger vessels on the secondary ports under this SOP2 and more fuel-efficient vessels. The site-specific



ESIAs/ESMPs for Boingoma Port and each secondary Port should manage risks relevant to this standard during preparation, construction, and operational phases.

ESS4 Community Health and Safety

ESS4 is assessed as relevant. During the construction phase, project activities have the potential to expose communities to health and safety risks especially in those communities that are situated immediately close to the Port construction activities. Communities could also be affected by the potential labor influx and SEA/GBV/SH. During the preparation of SOP1 for the Program, the Borrower has assessed SEA/GBV/SH risks through the preparation of a SEA/GBV/SH Risk Assessment and Action Plan. Influx of workers is the main underlying factor contributing to the risk of SEA/GBV/SH in the project. SEA/GBV/SH risks can be increased mainly due to (i) the influx of workers some of whom may be far from their families; (ii) increasing the disposable income of workers which can increase the incidence of prostitution (iii) the proximity of the sites to establishments such as schools, markets or other places frequented by women and girls. The Risk Assessment identifies mitigation measures to address this risk including creating awareness on SEA/GBV/SH, instituting a GBV sensitive GRM which is widely disseminated, inclusion of SEA/GBV/SH requirements in tender documents, ensuring that Contractors meet their obligation to establish an Action Plan for the prevention of SEA/GBV/SH, including an Accountability and Intervention Framework, and integrate it in the ESMP, development and signing of a Code of Conduct on SEA/GBV/SH for all workers and ensuring that GBV specialists are recruited at PIU, Supervision Engineer and Contractor level. This SEA/GBV/SH Risk Assessment and Action Plan will be reviewed to assess the risks with new secondary ports and include prevention and mitigation measures, and redisclosed for this SOP2.

Transportation of dredging materials related to the Boingoma port expansion SOP 1 and vehicle traffics during the civil works for SO! And SOP 2 will expose communities to health and safety risks from increased traffic during construction. Access to marine transport will also be impacted and measures will need to be in place to minimize health and safety risks where passenger access sites are re-located during construction. Guidance on managing risks related to traffic has been provided in ESIA and ESMF. The ESIA also includes detailed guidance on management of risks related to marine accidents during the operational phase. The ESIA for Boingoma port is composed of an existing safety and security zones. For the secondary port, the ESIA will include a social assessment to analyze the impacts on coastal livelihoods and recommend proper measures to keep the ecosystem providing regulating services or significant provisioning to local communities. These recommendations will be incorporated into ESMPs and implemented as Coastal Livelihood Restoration Plans. For all the construction work, site-specific ESMPs will require contractors to install a safety system around the project sites (fences and safety guards) during the entire construction period. When civil works take place, equipment and vehicles will be brought together to one single well-secured area during the night to ensure both community and worker's safety. A Community Health & Safety Plan will be required from contractors, which will also include procedures on incident investigation and reporting, recording and reporting of non-conformance, emergency preparedness and response procedures and community awareness raising activities. During the operation phase, measures to ensure the health and safety of passengers will be included in the ESMS to be developed for the Ministry of Maritime and Air Transport. This will provide guidance on managing boat and passenger safety. The C-ESMP shall conduct a Risk Hazard Assessment (RHA) for the activities during the civil works that have the potential to generate emergency event. Based on the results of the RHA, the enterprise shall prepare an Emergency Response Plan (ERP) part of C-ESMP in coordination with the relevant local



authorities and the affected communities. For the operation phase of Boingoma Port, the borrower shall conduct a Risk Hazard Assessment (RHA) for the activities during the port exploitation that have the potential to generate emergency event. Based on the results of the RHA, the port authority shall prepare an Emergency Response Plan (ERP) part of the ESMS in coordination with the relevant local authorities and the affected communities.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

Port improvement and construction is expected to require minimal, if any, land acquisition. Land occupied by ports belongs to the Government. However, screening and preparation of site-specific RAPs will provide evidence of land ownership and provide information about any existing claims and/or land use that will need to be compensated. For Boingoma Port, a screening was undertaken as part of the ESIA and has shown that no RAP will be needed. Further, construction work will require access roads and borrow pits. In the case of Boingoma port (Fomboni), borrow pit sites will be screened as part of the borrow pits Environmental and Social Impact Assessment. If the screening determines the need to prepare a RAP, this RAP will be developed by the borrower and approved by the Bank before the launching of the bidding process for the construction of Port Boingoma.

For secondary ports, crops are expected to be impacted by access roads. Smaller ports may also require the development of worker camps which will entail temporary land acquisition. Resettlement Action Plans (RAPs) will be prepared and implemented in such cases at each port site. All RAPs will address permanent and temporary land acquisition as well as economic impacts related to formal and informal use of land.

A Resettlement Policy Framework (RPF) prepared at SOP1 stage provides guidance on managing risks related to land acquisition and resettlement. The RPF will be reviewed and redisclosed before SOP2 appraisal.

RAPs will be prepared by a consulting firm and will be implemented by a RAP Service Provider firm to be hired after Project Appraisal. A Social/Resettlement Specialist has been hired by the PIU and is responsible for overall guidance and supervision on resettlement.

The expansion of the Boingoma port and the development of minor infrastructures offshore and at landing sites is expected to disturb the maritime traffic in the area e.g. for the artisanal fisherman and local people who are using the small boats for their daily transportation between the islands (potentially for their jobs). This perturbation will likely have economic impacts on fisherman. The ESMF will be updated to contain guidance and procedures to develop LRPs with livelihood restoration measures for those affected by restriction of access to fishing sites or other sources of livelihoods. For Port Boingoma, an assessment will be conducted to evaluate if infrastructure poses a threat to fisherman's Livelihood Resources. For secondary ports, livelihood impacts will be assessed as part of the ESIA/RAP process. Any LRP required will be developed before the implementation of these components.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

ESS6 is assessed as relevant. The project has the potential to cause adverse impacts on marine and terrestrial biodiversity around each Port site. The project will also disturb the marine habitat and potentially damage marine biotopes during dredging operation.

A marine biodiversity assessment has been conducted as part of the ESIA prepared for Boingoma port under SOP 1, which concluded that the marine ecosystem is composed of modified habitat. The risks and impacts could be reduced at acceptable level by using of dredging technologies and protective screens to limit the dispersion of resuspended



particles and materials. The preparation of a biodiversity management plan (BMP) is not required. But it is necessary to develop a coral reef restoration plan in standole document prepared by the RENAP and the construction contractor, in collaboration with the forestry services before launching of works and relevant expert.

During the exploitation phase of the port, it is recommended that ships must implement a ballast water management plan with record system and the harbor master's office must keep records of the types of waste landed on the vessels. A monitoring system of the physical and chemical quality of water should be maintained in collaboration with the regional direction of the environment, the ANAM and the National Park of Mohéli. The Port Authority will prepared the ESMS to consider the integrity/fragmentation of marine habitats due to marine works, impacts resulting from both construction activities and O&M activities, emergency events and indirect impacts such as increased access to previously inaccessible marine resources / areas should be considered and implemented with the regional direction of the environment, the ANAM and the National Park of Mohéli. Similarly, the port authority ESMS include the requirement to verify inbound ships' Ballast Water Management Plan, as per IMO's International Convention for the Control and Management of Ships' Ballast Water and Sediments (2004).

ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities

This ESS7 is not relevant as there are no communities nor peoples who meet the World Bank criteria for Indigenous Peoples/Sub-Saharan African Historically Undeserved Traditional Local Communities in Comoros.

ESS8 Cultural Heritage

ESS8 is assessed as relevant. Based on preliminary information in the ESIA for Boingoma port and ESMF for the secondary ports prepared for the program during SOP1 preparation, the sites that could be potentially affected by the project do not include any cultural heritage. But guidance on "Chance Find Procedures" have been included in the ESMF and ESIA and a chance find clause will be included in works contracts requiring contractors to stop construction if cultural heritage is encountered during construction and to closely coordinate with the relevant mandated Government authority for the salvaging and restoration of such cultural heritage.

ESS9 Financial Intermediaries

ESS9 is assessed as not relevant, as there will be no Financial Intermediaries as part of the project.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways	No
OP 7.60 Projects in Disputed Areas	No

III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE

Public Disclosure



A. Is a common approach being considered?

No

Financing Partners

A Common Approach is not anticipated to be applied at this time.

B. Proposed Measures, Actions and Timing (Borrower’s commitments)

Actions to be completed prior to Bank Board Approval:

The required ESF documents for the program have been prepared during SOP 1 preparation. These documents will be reviewed, updated as required, consulted and redisclosed prior to Appraisal of SOP 2:

- ESIA/ESMPs for Boingoma Port
- Updated ESMF for the two secondary ports
- Updated Stakeholder Engagement Plan (SEP) including GRM;
- Updated Environmental and Social Commitment Plan (ESCP);
- Labor Management Procedures (LMPs) and
- Updated SEA/SH Assessment and Action Plan under ESIA/ESMP
- Updated RPF

Possible issues to be addressed in the Borrower Environmental and Social Commitment Plan (ESCP):

- The Development of an ESIA/ESMP for the Borrow pits for Port Boingoma (to be developed by the borrower and approved by the Bank before the launching of the bidding process for the construction of Port Boingoma)
- The development of the C-ESMP for Port Boingoma to be developed by the selected contractor and approved by the Bank before the launching of the civil works on the ground by the Enterprise.
- Development and disclosure of RAPs and/or LRPs for Boingoma port and secondary ports like disbursement conditions (before the launching of construction works)
- The development of an assessment to identify impacts to Kwassa-Kwassa boat operators and, if determined by the assesment, the development and disclosure of an LRP.
- The development of ESIA/ ESMPs for Secondary Ports to be developed by the borrower and approved by the Bank before the signing of contract for the construction of Secondary Port
- The development of the C-ESMPs for secondary secondary ports to be developed by the contractor and approved by the Bank before the launching of the civil works on the ground by the Enterprise.

C. Timing

Tentative target date for preparing the Appraisal Stage ESRS

22-Nov-2022

IV. CONTACT POINTS

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Public Disclosure



Borrower/Client/Recipient

Borrower: The Union of Comoros

Implementing Agency(ies)

Implementing Agency: Ministry of Maritime and Air Transport

V. FOR MORE INFORMATION CONTACT

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VI. APPROVAL

Task Team Leader(s):	Atsushi Iimi
Practice Manager (ENR/Social)	Africa Eshogba Olojoba Recommended on 21-Jul-2022 at 16:47:37 GMT-04:00
Safeguards Advisor ESSA	Peter Leonard (SAESSA) Cleared on 21-Jul-2022 at 17:38:49 GMT-04:00