

**INTEGRATED SAFEGUARDS DATA SHEET  
APPRAISAL STAGE**

**Report No.: ISDSA2533**

**Date ISDS Prepared/Updated:** 07-Feb-2013

**Date ISDS Approved/Disclosed:** 12-Feb-2013

**I. BASIC INFORMATION**

**1. Basic Project Data**

|                                    |   |                              |                        |
|------------------------------------|---|------------------------------|------------------------|
| <b>Country:</b>                    | Africa  | <b>Project ID:</b>           | P118213                |
| <b>Project Name:</b>               | RCIP4 - Regional Communications Infrastructure Program - APL 4 (P118213)  |                              |                        |
| <b>Task Team Leader:</b>           | Timothy John Charles Kell   |                              |                        |
| <b>Estimated Appraisal Date:</b>   | 04-Feb-2013   | <b>Estimated Board Date:</b> | 16-Apr-2013            |
| <b>Managing Unit:</b>              | TWICT   | <b>Lending Instrument:</b>   | Adaptable Program Loan |
| <b>Sector:</b>                     | Telecommunications (60%), Information technology (30%), Public administration- Information and communications (10%)   |                              |                        |
| <b>Theme:</b>                      | Infrastructure services for private sector development (60%), Administrative and civil service reform (20%), Rural services and infrastructure (10%), Regulation and competition policy (10%) |                              |                        |
| <b>Financing (In USD Million)</b>  |   |                              |                        |
| <b>Financing Source</b>            |   |                              | <b>Amount</b>          |
| BORROWER/RECIPIENT                 |   |                              | 0.00                   |
| IDA Grant                          |   |                              | 22.00                  |
| Total                              |   |                              | 22.00                  |
| <b>Environmental Category:</b>     | B - Partial Assessment  |                              |                        |
| <b>Is this a Repeater project?</b> | No  |                              |                        |

**2. Project Objectives**

The development objectives of the proposed project are consistent with the PDO of the RCIP Program. The development objectives of the proposed RCIP 4 are to support the Recipient's efforts to: (i) lower prices for international capacity and extend the geographic reach of broadband networks (the connectivity development objective); and (ii) improve the Government's efficiency and transparency through e-Government applications (the transparency development objective).

**3. Project Description**

This is the fourth horizontal phase of the Regional Communications Infrastructure Program (RCIP)

that was approved on March 29, 2007. RCIP is focused on closing the terrestrial connectivity gap by linking the capitals and major cities in Eastern & Southern Africa (E&SA). To maximize flexibility and client responsiveness in this multi-country effort, RCIP has been designed as a customizable menu of options from which individual governments can choose from and adapt to their unique circumstances. The menu of activities is categorized under three overarching components: (a) enabling environment including monitoring and evaluation; (b) connectivity; and (c) e-Government applications (this latter is not included for Comoros).

Closing the terrestrial connectivity gap under RCIP requires the combination of two key interventions: (i) investment support based on public-private partnership as feasibility studies have shown that some segments of the infrastructure network would not be fully commercially viable on a strictly private sector financing model and require demand-enhancing initiatives (e.g., e-Government applications); and (ii) policy and regulatory support to ensure that once in place, the infrastructure is accessible to all service providers on open, transparent and non-discriminatory terms.

The implementation of RCIP 4 would better integrate Comoros within the region, allowing an increase in regional trade as well as becoming more competitive internationally. Enhanced regional connectivity would also provide Comoros with diversity of access to onward international connectivity on submarine cables improving reliability and redundancy. This would not only benefit Comoros, but also Mayotte, Madagascar and the wider region as well as the different participants of the regional infrastructure they would be connecting to. Increased regional traffic will enhance the viability of regional infrastructure and allow prices to drop. RCIP is designed to complement and benefit from other regional ICT activities that the World Bank Group is involved with including the Eastern Africa Submarine System (EASSy), Africa Coast to Europe (ACE), Central African Backbone (CAB), and West Africa Regional Communications Infrastructure Program (WARCIP). The proposed RCIP Comoros IDA grant would be for US\$22 million (including contingencies) over a period of five years, of which US\$21 million would come from the Regional IDA allocation and US\$1m from national IDA allocation.

The main Project components, corresponding to a total investment cost estimated at US\$22 million will consist of:

- Component 1 - Enabling Environment (US\$3.3 million). This component aims to promote further regional market integration, sector liberalization, and legal and regulatory reforms, and would include subcomponents focused on Technical Assistance (TA), capacity building, and training including the TA to assist the government with preparatory work for the proposed submarine cable FLY (Comoros – Mayotte – Madagascar), including environmental studies and, if required, feasibility studies and demand analysis;
- Component 2 – Connectivity (US\$17 million). This component would finance (i) membership in the FLY cable -- the link between Comoros, Mayotte and Madagascar -- under a PPP arrangement, which will ensure connectivity with LION-2; (ii) advance purchase of additional broadband capacity from EASSy and/or LION2 and its use to provide demand stimulation measures by providing affordable bandwidth to key users such as the university, schools, hospitals, etc.; and (iii) additional measures to stimulate demand including by promoting the creation of local ISPs and establishing a carrier-independent internet-exchange point (IXP).
- Component 3 - Project Management (US\$1.5 million). This component would consist of support to finance project management costs including project coordination, procurement, financial management, monitoring & evaluation, communication, environmental and social safeguards, office equipment, incremental operating costs, and audits.

#### **4. Project location and salient physical characteristics relevant to the safeguard analysis (if known)**

In Comoros, the project has a national level coverage, reaching out to both rural and urban areas.

## 5. Environmental and Social Safeguards Specialists

Cheikh A. T. Sagna (AFTCS)

Paul-Jean Feno (AFTN1)

| 6. Safeguard Policies                          | Triggered? | Explanation (Optional) |
|--|------------|------------------------|
| Environmental Assessment OP/ BP 4.01           | Yes        |                        |
| Natural Habitats OP/BP 4.04                    | No         |                        |
| Forests OP/BP 4.36                             | No         |                        |
| Pest Management OP 4.09                        | No         |                        |
| Physical Cultural Resources OP/ BP 4.11        | No         |                        |
| Indigenous Peoples OP/BP 4.10                  | No         |                        |
| Involuntary Resettlement OP/BP 4.12            | Yes        |                        |
| Safety of Dams OP/BP 4.37                      | No         |                        |
| Projects on International Waterways OP/BP 7.50 | No         |                        |
| Projects in Disputed Areas OP/BP 7.60          | Yes        |                        |

## II. Key Safeguard Policy Issues and Their Management

### A. Summary of Key Safeguard Issues

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| <p><b>1. Describe any safeguard issues and impacts associated with the Restructured project. Identify and describe any potential large scale, significant and/or irreversible impacts:</b></p> <p>No major negative impacts are expected of the activities proposed to be funded under RCIP4. There would be localized potential environmental and social impacts associated with the infrastructure components of the project, particularly associated with: (i) the linear excavations for burying fiber-optic cable (alternatively overhead stringing of the cable) and civil works associated with building of national terrestrial backbones, rollout of rural networks, and of the landing stations, and (ii) in Comoros, temporary perturbation of marine ecosystem during the civil works of submarine cable. The small environmental and social disturbances caused by the laying of the cable are not expected to have any perceptible effect on the quality of the coastal waters of the Indian Ocean or on marine species or habitats. For the cable and associated equipment onshore, there may be some temporary, low to moderate environmental and social impacts including localized impacts to near shore marine life and local fishermen's activities (e.g., access to fishing areas). In addition, the activities proposed to be funded under RCIP4 could involve land acquisition for or loss of access (even temporarily) to some socioeconomic assets during the construction of telecommunications infrastructure such as ducts for laying fibers optic networks or access roads.</p> |
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| <p>Considering the nature and magnitude of potential environmental and social impacts of the activities proposed to be funded under RCIP4, the Project is socially and environmentally classified as a Category "B". Activities supported by the proposed operation are expected to have some site-specific adverse environmental and social impacts; therefore, the following Safeguards policies are triggered: OP/BP 4.01 (Environmental Assessment); OP/BP 4.12 (Involuntary Resettlement) and OP/BP 7.60 (Projects in Disputed Areas).</p>  |
| <p><b>2. Describe any potential indirect and/or long term impacts due to anticipated future activities in the project area:</b></p>  |
| <p>In light of the provisions made under the project for environmental and social management, potential indirect and/or long term impacts due to the planned activities are not anticipated.</p>   |
| <p><b>3. Describe any project alternatives (if relevant) considered to help avoid or minimize adverse impacts.</b></p>   |
| <p>N/A</p>   |
| <p><b>4. Describe measures taken by the borrower to address safeguard policy issues. Provide an assessment of borrower capacity to plan and implement the measures described.</b></p>  |
| <p>The environmental and social classification of the proposed RCIP4 is Category B. Since at this very stage there is no clear understanding of the project footprint, the borrower has prepared an Environmental and Social Management Framework (ESMF) and a Resettlement Policy Frameworks (RPF) (consistent with both the national laws and regulations and World Bank operational safeguards policies, namely OP/BP 4.01 and OP/BP 4.12 respectively) and a Resettlement Policy Frameworks (RPF). The ESMF indicates the basic principles and procedures to be followed by the Government to: (i) assess the environmental and social impacts; (ii) outline the environmental management procedures and provide the necessary tools to mitigate the impacts; and (iii) integrate environmental and social considerations into each phase of the project cycle once the clear footprint of the project is known prior to implementation. The ESMF provides both an Environmental and Social Screening Form (ESSF) and Environmental and Social Checklist to be used by the borrower to define subproject categories and the details level of the appropriate safeguards instrument. The ESMF also provides Environmental and Social Clauses (ESC) for inclusion in bidding documents and contractors' contracts, payment of which will be subject to the effective implementation of these clauses by the field engineer. Implementation of these clauses will be monitored by the project Environmental and Social Focal Point (ESFP) of the Project Implementation Unit (PIU). Finally, the ESMF describes the chance-finds procedures to be followed throughout implementation to ensure proper management of any unknown physical cultural resources discovered. Likewise, the RPF sets forth the basic principles and procedures to be followed by the Government during project implementation. It offers a comprehensive socio-economic census that captures gender and other poor and vulnerable groups' issues (including children, handicapped and the elderly), and presents the institutional arrangements, grievance redress mechanism, estimated budget, and monitoring and evaluation approach to be adopted when applying the RPF, as well as a template for preparing a Resettlement Action Plan (RAP), where applicable.</p> <p>Hence, Once the final sites are chosen and the specific civil works identified, and depending on the screening outcome, site specific Environmental and Social Management Plans (ESMPs) or Environmental and Social Impacts Assessment (ESIAs) with Environmental and Social Management Plans (ESMP) and/or site specific Resettlement Action Plans (RAPs) for the terrestrial facilities during in line with the RPF will be prepared, publicly consulted upon, and</p> |

disclosed both in-country (on the project sites and newspapers, etc.) and at the InfoShop prior to the physical implementation of the said-activity.

Both ESMF and RPF were cleared by the Bank and publicly disclosed both in Country on December 10, 2012, and at the InfoShop on December 11, 2012.

The project will be coordinated and supervised by the Unit for follow-up of Economic and Financial Reforms (CREF), within the Vice-Presidency for Finance. The unit for Support for Good Governance (ABGE) would be the project implementation unit (PIU). The CREF would also work closely with the regulatory agency, ANRTIC (Autorité Nationale de Régulation Des Technologies de l'Information et de la Communication) on certain regulatory issues as well as with the Ministry of Posts and Telecommunications, Promotion of New ICTs, and Transport and Tourism. The PIU will be responsible for day-to-day project implementation and monitoring of the three components, including all fiduciary aspects, monitoring and evaluation, and safeguards. In this context, the PIU has agreed to hire a Social and Environmental Focal Point (SEFP) to ensure the project compliance with the safeguard environmental and social requirements. Local Government and communities will participate in any consultations, as the case arises, during the preparation of safeguards instruments as well as the implementation of mitigation/compensation measures.

The team has sought expert advice on whether OP/BP 7.60 – on Projects in Disputed Areas, should be triggered. The information available is that although the Island of Mayotte is an integral Département of France, the Union of Comoros claims sovereignty over it. Since 1974, France has disputed the claim over Mayotte by Comoros. When the Comoros Islands were on the verge of independence from France in 1974, the population of Mayotte voted in favor of remaining under French jurisdiction. Despite the results of the referendum, Comoros asserted sovereignty over Mayotte in its entirety stating that the 1974 referendum was an archipelago-wide vote as opposed to the view taken by Mayotte that the referendum was an island-by-island decision. The claim by Comoros was supported by the predecessor of the African Union, the Organization of African Unity (OAU). The matter was referred to the UN General Assembly which in Resolution 31/4 of 21 October 1976 on the "Question of the Comorian Island of Mayotte" voted in support of the position by Comoros. A more recent referendum in March 2009 led to the same result, with the African Union, again declaring support for the position expressed by Comoros. For its part, France maintains that the island will remain an overseas Département of France for as long as its population wishes for this to be the case. In accordance with OP.7.60, the project team has discussed the issue with both the Comorian government and the Counsellor for Cooperation and Culture at the French Embassy in Moroni (meeting on 11 September 2012, documented in the aide memoire). Both the representatives of the French Embassy in Moroni and the Comorian Government confirmed that they would have no objection to the project and, indeed, that they encourage it to go ahead. Taking this support into account, as well as the nature and objectives of the Project, we consider that that the project is not harmful to the interests of the two claimants. A memorandum to this effect has been prepared for the Country Director to send to the Managing Director through the Regional Vice President as required by OP/BP 7.60. This memorandum was prepared in close collaboration with the Environmental and International Law Unit of the Legal Department (LEGEN). By supporting the project, the Bank does not intend to make any judgment on the legal or other status of the territories concerned or to prejudice the final determination of the parties' claims.

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| <p><b>5. Identify the key stakeholders and describe the mechanisms for consultation and disclosure</b></p> <p><del>The ESMF and RPFs, with an emphasis on potentially affected people.</del> which was based on (i) field visits and (ii) discussions in organized meetings with local communities, local administrative and traditional leaders, and representative of Ministry in charge of Environment and the sector Ministry involved (Telecommunication, Finances and Public Works). During each meeting the scope of the project was discussed, in terms of its economic, social, cultural and environmental impacts. Measures to mitigate its impact and increase its wellbeing were presented to the audiences. During implementation of the proposed operations, the Environmental and social Safeguards instruments (ESIA, RAP ESMP ...etc.) will be prepared through a consultative and participatory process involving all stakeholders at the regional and national levels as well as within local communities. The implementing agency will initiate these public consultations as early as possible and will provide all relevant material in a form and language(s) that are understandable and accessible to the groups being consulted in a timely manner prior to consultation. The ESMF and RPF have been disclosed in the three Islands before appraisal (December 11 2012) and shared with concerned nongovernmental organizations and other development partners.</p> |
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### **B. Disclosure Requirements**

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| <b>Environmental Assessment/Audit/Management Plan/Other</b>   |             |
| Was the document disclosed prior to appraisal?  |             |
| Date of receipt by the Bank   | 22-Oct-2012 |
| Date of submission to InfoShop  | 11-Dec-2012 |
| For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors  |             |
| "In country" Disclosure   |             |
| Comoros   | 10-Dec-2012 |
| <i>Comments:</i> Available for consultation at offices of ABGE and published in local journal   |             |
| <b>Resettlement Action Plan/Framework/Policy Process</b>  |             |
| Was the document disclosed prior to appraisal?  |             |
| Date of receipt by the Bank   | 22-Oct-2012 |
| Date of submission to InfoShop  | 11-Dec-2012 |
| "In country" Disclosure   |             |
| Comoros   | 10-Dec-2012 |
| <i>Comments:</i> Available for consultation at offices of ABGE and published in local journal   |             |
| <b>If the project triggers the Pest Management and/or Physical Cultural Resources policies, the respective issues are to be addressed and disclosed as part of the Environmental Assessment/Audit/or EMP.</b> |             |
| <b>If in-country disclosure of any of the above documents is not expected, please explain why:</b>  |             |
|   |             |

### **C. Compliance Monitoring Indicators at the Corporate Level**

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|--|---|
| <b>OP/BP/GP 4.01 - Environment Assessment</b>                                      |   |
| Are the cost and the accountabilities for the EMP incorporated in the credit/loan? | Yes [ <input checked="" type="checkbox"/> ] No [ <input type="checkbox"/> ] NA [ <input type="checkbox"/> ] |
| <b>OP/BP 4.12 - Involuntary Resettlement</b>                                       |   |

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| If yes, then did the Regional unit responsible for safeguards or Sector Manager review the plan?   | Yes [ <input checked="" type="checkbox"/> ] No [ <input type="checkbox"/> ] NA [ <input type="checkbox"/> ] |
| <b>OP 7.60 - Projects in Disputed Areas</b>  |   |
| Does the PAD/MOP include the standard disclaimer referred to in the OP?  | Yes [ <input checked="" type="checkbox"/> ] No [ <input type="checkbox"/> ] NA [ <input type="checkbox"/> ] |
| <b>The World Bank Policy on Disclosure of Information</b>  |   |
| Have relevant safeguard policies documents been sent to the World Bank's Infoshop?   | Yes [ <input checked="" type="checkbox"/> ] No [ <input type="checkbox"/> ] NA [ <input type="checkbox"/> ] |
| Have relevant documents been disclosed in-country in a public place in a form and language that are understandable and accessible to project-affected groups and local NGOs? | Yes [ <input checked="" type="checkbox"/> ] No [ <input type="checkbox"/> ] NA [ <input type="checkbox"/> ] |
| <b>All Safeguard Policies</b>  |   |
| Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies?                  | Yes [ <input checked="" type="checkbox"/> ] No [ <input type="checkbox"/> ] NA [ <input type="checkbox"/> ] |
| Have costs related to safeguard policy measures been included in the project cost?   | Yes [ <input checked="" type="checkbox"/> ] No [ <input type="checkbox"/> ] NA [ <input type="checkbox"/> ] |
| Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies?                             | Yes [ <input checked="" type="checkbox"/> ] No [ <input type="checkbox"/> ] NA [ <input type="checkbox"/> ] |
| Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents?                           | Yes [ <input checked="" type="checkbox"/> ] No [ <input type="checkbox"/> ] NA [ <input type="checkbox"/> ] |

### III. APPROVALS

|                                  |                                   |                   |
|----------------------------------|-----------------------------------|-------------------|
| Task Team Leader:                | Timothy John Charles Kell         |                   |
| <b>Approved By</b>               |                                   |                   |
| Regional Safeguards Coordinator: | Name: Alexandra C. Bezeredi (RSA) | Date: 12-Feb-2013 |
| Sector Manager:                  | Name: Randeep Sudan (SM)          | Date: 11-Feb-2013 |