

UNION DES COMORES

Unité-Solidarité-Développement



**Comoros Additional Financing for
SADC Regional Statistics Project (P175731)**

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

Negotiated version

December 01, 2025

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Union of the Comoros (hereinafter the Recipient) is implementing the SADC Regional Statistics Project (P175731) (the Project) with the involvement of the Institut National de la Statistique et des Études Économiques et Démographiques (INSEED) under the Ministry of Finance, Budget and Banking (MFBB), as set out in the Original Financing Agreement and the Additional Financing Agreement (the Agreements). The International Development Association (hereinafter the Association) has agreed to provide the original financing and additional financing for the Project, as set out in Agreements. This ESCP supersedes previous versions of the ESCP for the Project and shall apply both to the original and the additional financing for the Project referred to above.
2. The Recipient shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Association. The ESCP is a part of the Agreements. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred Agreements.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Recipient shall carry out or cause to be carried out, including, as applicable, their respective timeframes; institutional, staffing, training, monitoring and reporting arrangements; and grievance management. The ESCP also sets out the environmental and social (E&S) documents that shall be prepared or updated, consulted, disclosed and implemented under the Project, consistent with the ESSs, in form and substance acceptable to the Association. Said E&S documents may be revised from time to time with prior written agreement by the Association. As provided for under the referred Agreements, the Recipient shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.
4. As agreed by the Association and the Recipient, this ESCP will be revised from time to time, if necessary, to reflect adaptive management of Project changes or unforeseen circumstances or in response to Project performance. In such circumstances, the Recipient and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient's General Director of the INSEED. The Recipient shall promptly disclose the updated ESCP.
5. The subsection on "Indicators for Implementation Readiness" below identifies the actions and measures to be monitored to assess Project readiness to begin implementation in accordance with this ESCP. Nevertheless, all actions and measures in this ESCP shall be implemented as set out in the "Timeframe" column below irrespective of whether they are listed in the referred subsection.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT			
A	ORGANIZATIONAL STRUCTURE Maintain the PIU with qualified staff and resources to support management of environmental, social, health and safety risks and impacts of the Project, including an Environmental and Social Specialist	Maintain the PIU, including the Environmental and Social Specialist, throughout Project implementation period.	Ministry of Finance, Budget and Banking/INSEED
B	Prepare and implement a Capacity Building Plan for PIU staff and contractors on Occupational Health and Safety, Community Health and Safety, Waste management, Incident reporting, Inclusion of vulnerable and disadvantaged groups in the consultation process, Project Grievance Mechanism, SEA-SH awareness, control and prevention.	Adopt the Capacity Building plan no later than 03 months after the Effective Date of the additional financing and thereafter implement it throughout the Project implementation period.	Ministry of Finance, Budget and Banking /INSEED
MONITORING AND REPORTING			
C	REGULAR REPORTING Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (E&S) performance of the Project. The reports shall include: <ul style="list-style-type: none"> • Status of preparation and implementation of E&S documents required under the ESCP. • Summary of stakeholder engagement activities carried out as per the Stakeholder Engagement Plan. • Complaints submitted to the grievance mechanism(s), the grievance log, and progress made in resolving them. • E&S performance of contractors and subcontractors as reported through [monthly] contractors' and supervision firms' reports. • Number and status of resolution of incidents and accidents reported under action E below. 	Submit quarterly reports to the Association throughout Project implementation. Submit each report to the Association no later than 15 days after the end of each reporting period.	Ministry of Finance, Budget and Banking/INSEED
D	CONTRACTORS' MONTHLY REPORTS Require contractors and supervising firms to provide monthly monitoring reports on E&S performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the Association.	Submit the monthly reports to the Association upon request or as annexes to the reports to be submitted under action C above.	Ministry of Finance, Budget and Banking /INSEED
E	INCIDENTS AND ACCIDENTS a) Notify the Association of any incident or accident relating to the project which has, or is likely to have, a significant adverse effect on the		

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	<p>environment, the affected communities, the public or workers, including those resulting in death or significant injury to workers or the public; acts of violence, discrimination or protest; unforeseen impacts to cultural heritage or biodiversity resources; pollution of the environment; forced or child labor; displacement without due process (forced eviction); allegations of sexual exploitation or abuse (SEA), or sexual harassment (SH); or disease outbreaks. Provide available details of the incident or accident to the Association upon request. Without any limitations to the foregoing, for SEA/SH incidents, the Recipient shall ensure confidentiality for the survivor and the alleged perpetrator.</p> <p>b) Arrange for an appropriate review of the incident or accident to establish its immediate, underlying and root causes. Prepare, agree with the Association, and implement a Corrective Action Plan that sets out the measures and actions to be taken to address the incident or accident and prevent its recurrence.</p>	<p>a) Notify the Association no later than 48 hours after learning of the incident or accident.</p> <p>b) Provide review report (root cause analysis) and Corrective Action Plan to the Association no later than 10 days following the submissions of the initial notice, unless a different timeframe is agreed to in writing by the Association.</p>	Ministry of Finance, Budget and Banking /INSEED
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1.	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS</p> <p>a) Develop and Implement the E&S instruments below consistent with the relevant ESSs:</p> <ul style="list-style-type: none"> - Electronic and electrical waste management plan (EEWMP); - Check-list ESMP for the rehabilitation of the INSEED office <p>b) Prepare and adopt, submit for Association approval and implement any additional subproject Check list ESMP consistent with the relevant ESSs.</p>	<p>a) The EEWMP has been disclosed on February 25th, 2023. The Check-list ESMP is being developed and shall be disclosed prior to the start of civil works. Implement the Check-list ESMP and EEWMP throughout Project implementation.</p> <p>b) Adopt the relevant checklist ESMP prior to the bidding process and prior to carrying out for the respective subproject that requires such instruments and thereafter implement throughout Project implementation.</p>	Ministry of Finance, Budget and Banking /INSEED
1.2	<p>MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&S instruments, the Labor Management Procedures (LMP), and</p>	As part of the preparation of procurement documents and respective contracts.	

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	code of conduct, into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply and cause subcontractors to comply with the ESHS specifications of their respective contracts. Provide copies of the relevant contracts with contractors/subcontractors and supervision firms to the Association.	Supervise contractors throughout Project implementation. Copies of relevant contracts provided to the Association, upon request.	Ministry of Finance, Budget and Banking /INSEED
1.3	TECHNICAL ASSISTANCE Carry out the consultancies, studies (including feasibility studies, if applicable), capacity building, training, and any other technical assistance activities under the Project in accordance with terms of reference acceptable to the Association that are consistent with the ESSs. Thereafter prepare and finalize the outputs of such activities in compliance with the terms of reference.	Throughout implementation of the Activities.	Ministry of Finance, Budget and Banking /INSEED
ESS 2: LABOR AND WORKING CONDITIONS			
2.1.	LABOR MANAGEMENT PROCEDURES a) Develop, adopt, and implement a Labor Management Procedures (LMP) for the Project, including, inter alia, provisions on working conditions, management of workers relationships, occupational health and safety (including personal protective equipment, and emergency preparedness and response), code of conduct (including relating to SEA and SH), forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms. b) Ensure the signing of contracts, including the code of conduct, with all direct workers, contracted workers and primary supplier workers consistent with the LMP.	a) Implement the LMP that was disclosed on February 25th, 2023, throughout Project implementation. b) Prior to engaging any Project workers. Before the start of Project staff service and thereafter maintain throughout the Project implementation.	Ministry of Finance, Budget and Banking /INSEED
2.2	OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN Require contractors and subcontractors to prepare and implement OHS Management Measures or Plan in accordance with Check list ESMP as well as LMP.	Prepare the OHS Management Measures prior to start of civil works, and thereafter implement the plan throughout project implementation.	INSEED

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
2.3.	GRIEVANCE MECHANISM FOR PROJECT WORKERS Establish and operate a grievance mechanism (GM) for Project workers that also captures SEA/HS complaints, as described in the LMP and consistent with ESS2.	Establish the GM prior to engaging Project workers and thereafter maintain and operate it throughout Project implementation.	Ministry of Finance, Budget and Banking /INSEED
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	WASTE MANAGEMENT PLAN Adopt and implement an Electronic and Electrical Waste Management Plan (EEWMP), as part of relevant subproject instruments, to manage hazardous and non-hazardous wastes, including e-wastes, consistent with ESS3.	Implement the EEWMP that was disclosed on February 25th, 2023, and then implement the EEWMP throughout the project implementation.	Ministry of Finance, Budget and Banking /INSEED
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	COMMUNITY HEALTH AND SAFETY Ensure that project workers receive the necessary training on health, and safety measures to avoid any health or security issues impact on the population	Same timeline as under section B above	Ministry of Finance, Budget and Banking /INSEED
4.2	SEA AND SH RISKS Integrate Codes of conduct and SEA-SH prevention measures into contractual and procurement documents (ToRs, DAOs, workers' contracts).	Same timeframe as the preparation of procurement documents.	Ministry of Finance, Budget and Banking /INSEED
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
NOT RELEVANT			
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
NOT RELEVANT			
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
NOT RELEVANT			
ESS 8: CULTURAL HERITAGE			
NOT RELEVANT			
ESS 9: FINANCIAL INTERMEDIARIES			
NOT RELEVANT			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	Update and implement a Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, which include measures to, inter alia, provide stakeholders with timely, relevant, understandable, and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.	Implement the SEP, which was updated and disclosed on October 28th, 2025, throughout Project implementation.	Ministry of Finance, Budget and Banking /INSEED
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>Establish, publicize, maintain, and operate an accessible grievance mechanism (GM) to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10.</p> <p>The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.</p>	GM was established during the implementation of the Parent Project. Implement the GM throughout Project implementation.	Ministry of Finance, Budget and Banking /INSEED
INDICATORS FOR IMPLEMENTATION READINESS			
	The following actions are indicators for implementation readiness: Undertake a capacity building assessment to identify the additional training needs. These training requirements will be captured in a capacity building plan to be shared with the Association.		