

Federal Republic of Somalia



MINISTRY OF FINANCE

Somalia Enhancing Public Resource Management Project SERP (P177298)

DRAFT ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

October 2022

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Federal Republic of Somalia (“the Recipient”) through the Ministry of Finance (MoF) at the federal level with the involvement of other ministries and participating Federal Member States on relevant activities, shall implement the **Somalia Enhancing Public Resource Management Project (P177298)** (“**the Project**” “Agreement”). The International Development Association and Somalia Multi-Partner Fund (TF) (“**the Association**”) have agreed to provide financing for the Project as set out in the Grant Agreement.
2. The Recipient shall ensure that the Project is implemented in accordance with the Environmental and Social Standards (**ESSs**) and this Environmental and Social Commitment Plan (ESCP) in a manner acceptable to the Association. This (ESCP) sets out material measures and actions, any specific documents or plans, as well as the timing for each of the activities and is a part of the Grant Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the Agreement.
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, the timeframes of the actions and measures, institutional, staffing, training, monitoring and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, and in form and substance, and in a manner acceptable to the World Bank. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the International Development Association.
4. As agreed by the International Development Association and the Recipient, this ESCP shall be revised from time to time if necessary, during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the Recipient, through the Ministry of Public Works, Reconstruction and Housing, and the International Development Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the International Development Association and the Recipient. The Recipient shall promptly disclose the updated ESCP.

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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&S documents required under the ESCP; stakeholder engagement activities; and functioning of the grievance redress mechanism.</p>	<p>Submit quarterly reports to the Association throughout project implementation, commencing after the Effective Date. Submit each report to the Association no later than 30 days after the end of each reporting period.</p>	<p>Project Coordination Unit (PCU)</p>
B	<p>INCIDENTS AND ACCIDENTS NOTIFICATION</p> <p>Promptly notify the Association of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including, inter alia, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injury [specify other examples of incidents and accidents, as appropriate for the type of operation]. Provide sufficient details regarding the scope, severity, and possible causes of 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.</p> <p>Subsequently, at the Association's request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.</p>	<p>Notify the Association no later than 48 hours after learning of the incident or accident.</p> <p>A subsequent report shall be provided within a timeframe acceptable to the Association, as requested.</p> <p>Report all other incidents and accidents to the Association in quarterly reports.</p>	<p>PCU</p>

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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
C	<p>CONTRACTORS MONTHLY REPORTS</p> <p>Require contractors and supervising firms to provide monthly monitoring reports on ESHS performance in accordance with the metrics specified in the respective bidding documents and contracts.</p> <p>At the Association’s request, provide to the Association the contractors’, design and supervision consultants’ monthly monitoring reports on E&S implementation submitted to the Project Steering Committee (PSC).</p>	<p>Monthly preparation of the reports.</p> <p>Upon request by the Association.</p>	PCU
<p>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</p>			

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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>Establish and maintain an organizational structure including a Project Steering Committee (PSC) with responsibility for strategic policy and decision making, technical coordination between Federal Government of Somalia (FGS) and Federal Member States (FMS), and leading on harmonization where appropriate.</p> <p>Establish and maintain a Project Coordination Unit (PCU) at the Ministry of Finance in the FGS to provide support services to implementing FGS and FMS MDAs and coordinate implementation at the FGS and between the FGS and FMS, staffed with one qualified full-time Environmental Specialist and one full-time Social Specialist. There shall be a focal persons appointed in each key MDA to participate in the project in support of the E&S specialists. The project shall leverage on the existing projects for support on GBV/SEAH and security risk management. Somaliland (SL) shall establish a central coordination mechanism along with project implementation arrangements.</p> <p>Mobilize additional staff on short-term or long-term assignment as necessary to ensure compliance of the Project with the ESSs, including subject matter specialists on Gender Based Violence (GBV)/Sexual exploitation and Abuse (SEA), labor conditions (occupational health & safety), and social inclusion. These may be seconded from other Ministries or agencies or through cross-support from a Bank-supported projects or directly hired for the Project.</p>	<p>Establish the PSC, PCU and PIU no later than two months after the Effective Date and maintain the PSC, PCU and PIU(s) throughout Project implementation.</p>	<p>PCU</p>

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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.2	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENT</p> <p>Undertake, adopt and implement site-specific environmental and social risk screening and impact assessments for subprojects including assessment of the physical environment, location of facilities to be upgraded under the Project, availability of suitable land free of encumbrances and contestation, ensuring equity and inclusivity of site selections - as well as capacity of likely contractors to implement environmental and social risks management instruments and monitoring arrangements. Such assessment shall also include activities born out of expenditure incurred prior to the signing of the Agreement (retroactive financing). Assessment of retroactively financed activities shall be conducted to ensure compliance with ESF requirements.</p>	<p>Prior to implementation of site-specific subprojects.</p>	<p>PCU</p>

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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.3	<p>MANAGEMENT TOOLS AND INSTRUMENTS</p> <p>Assess the environmental and social risks and impacts of proposed Project activities, in accordance with the ESSs and the Environmental and Social Management Framework (ESMF), Labour Management Procedures (LMP), SEAH Prevention and Response Action Plan (SEAH-PRAP), and Security Management Framework (SMF) to be prepared, disclosed, and adopted for the Project. Ensure through these instruments that individuals or groups who, because of their particular circumstances, may be disadvantaged or vulnerable, have access to the development benefits resulting from the Project.</p> <p>Prepare, disclose, and adopt site-specific Environmental and Social Management Plans (ESMPs) consistent with the ESSs, in a manner satisfactory to the Association. These plans shall include measures necessary for construction and rehabilitation of government offices and facilities under this Project.</p>	<p>Prepare, clear, disclose and adopt the ESMF, LMP, SEAH-PRAP and SMF before Project effectiveness</p> <p>Prepare, clear, disclose and adopt the ESMP prior to the relevant contractors' bidding phase</p>	<p>PCU</p> <p>PCU</p>

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<p>1.4</p>	<p>MANAGEMENT OF CONTRACTORS:</p> <p>Incorporate the relevant aspects of the ESCP, including the relevant E&S instruments (e.g., ESMF, ESMPs), and the LMP and SMF, into the ESHS specifications of the procurement documents with contractors. Thereafter, ensure that the contractors comply with the ESHS specifications of their respective contracts.</p> <p>Develop and implement procedures for managing contractors and subcontractors including ensuring that:</p> <ul style="list-style-type: none"> Contractors comply with the national laws, e.g., licenses to operate and excavate any sites for project purposes. <p>Relevant environmental and social requirements are included in the procurement and contracting process including bidding documents, contracts and subcontracts consistent with the requirements of ESSs.</p> <ul style="list-style-type: none"> Contractors submit an ESMP including all E&S requirements as part of the bidding process and show that they have sufficient staff and capacity to carry it out. Contractors are made aware of requirements for Codes of Conduct (CoCs), which also apply to subcontractors, primary suppliers and their workers and covers conditions of service, occupational health and safety (OHS), gender-based violence (GBV) and security requirements. Contractors' commitment and compliance with ESSs are monitored. There is provision for a GRM for contractors and subcontractors, primary suppliers, communities and other stakeholders as well as employees. Contractors and primary suppliers provide details on their oversight on ESHS performance and adequate mechanisms for serious incident reporting should it be required. 	<p>Prior to the preparation of procurement documents. Supervise contractors throughout Project implementation.</p>	<p>PCU, PIUs, contractors, supervision consultants</p>
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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	<ul style="list-style-type: none"> The performance of the contractors and primary suppliers is monitored to ensure that they comply with the ESHS specifications of their respective contracts in accordance with the ESMF, LMP, SEAH-PRAP, and SMF. 		
1.5	<p>TECHNICAL ASSISTANCE Ensure that the consultancies, studies, capacity building, training, and any other technical assistance activities under the Project are carried out in accordance with terms of reference acceptable to the Association, that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference and the ESSs requirement.</p>	Throughout Project implementation.	PCU
ESS 2: LABOR AND WORKING CONDITIONS			

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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
2.1	<p>LABOR MANAGEMENT PROCEDURES (LMP) Develop and implement an LMP to address labour risks, including (but not limited to):</p> <ul style="list-style-type: none"> ▪ conditions of service. ▪ code of conduct. ▪ occupational, health and safety (OHS) measures. ▪ Covid-19 prevention measures. ▪ prevention of child and forced labour. ▪ emergency preparedness and response. ▪ grievance redress mechanism for project workers. ▪ training of project workers on key issues including OHS and GBV prevention. ▪ management of labor influx. ▪ Discrimination of the vulnerable and disadvantaged groups/persons ▪ Eligibility accessibility to pension services ▪ Equitable and based salary ▪ Recruitment standards, retention, and termination processes. ▪ TA ToR and output be consistent with ESS2 	LMP shall be prepared and cleared by the Association before Project effectiveness	PCU
2.2	<p>GRIEVANCE REDRESS MECHANISM FOR PROJECT WORKERS Develop and maintain a GRM for direct Project workers, including contracted and primary supply workers as part of the LMP as well as a separate confidential mechanism for GBV/SEAH complaints.</p>	Establish GRM prior to engaging Project workers. The mechanism shall be maintained throughout Project implementation.	PCU

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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
2.3	<p>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES Develop and implement occupational, health and safety (OHS) measures, based on the EHS Guidelines of the International Development Association, as part of the LMP including through, <i>inter alia</i>, implementing adequate OHS measures and incorporating Labour Management Procedures and Security Management Framework and SEAH Prevention and Response Action Plan requirements into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms.</p>	<p>Measures to be operational prior to engaging Project workers.</p>	<p>PCU</p>

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ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT: Incorporate resource efficiency and pollution prevention and management measures in the ESMF and area specific ESMPs to be prepared under action 1.3 above.</p>	<p>On timeframes specified in action 1.3 above for the ESMF and ESMPs.</p> <p>Monitor implementation of the ESMF and area specific ESMPs throughout Project implementation.</p>	PCU
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>COMMUNITY HEALTH AND SAFETY: Adopt and implement measures and actions to assess and manage specific risks and impacts to the community arising from Project activities, including risks of labour influx, risk of exposure to infectious diseases (including COVID-19 and HIV/AIDS), response to emergency situations due to conflict or natural disasters, construction and structural safety risks, as well as traffic and road safety risks, and include these measures and actions in the ESMPs to be prepared in a manner acceptable to the Association.</p> <p>Ensure that any new facilities upgraded under this Project are designed and modelled on the internationally accepted safe standards for institutions, with provision of adequate access to potable water and sanitation office workers. The Recipient shall also ensure that indoor air quality (IAQ) is in compliance with World Health Organisation guidelines, including working to eliminate smoking in public spaces in the project-supported facilities, including the newly rehabilitated Somali government offices.</p>	<p>On timeframe specified in action 1.3 above for the ESMPs. Monitor implementation throughout Project implementation.</p>	PCU

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<p>4.2</p>	<p>GBV AND SEA RISKS: Prepare, adopt, publicly disclose and implement a stand-alone project wide SEAH Action and Response Plan (SEAH-PRAP). Key measures include:</p> <ul style="list-style-type: none"> ▪ CoCs for project and contracted workers; and plan for sensitization/awareness raising for the community and intended training activities for workers on CoC and GBV/SEA provisions. ▪ Mapping and development of partnerships with identified GBV service providers. ▪ A Reporting and Response Framework that outlines key requirements for reporting cases if they arise and measures to enable safe, ethical, survivor-centered response. ▪ An Accountability Framework that outlines how the PSC/contractor shall handle allegations, including related to investigation (in alignment with national processes) and sanctions for potential perpetrators. ▪ Establishment of special channel/procedures for safe, confidential and survivor centered reporting of GBV incidence that connect to the project GRM and enable training of GRM operators on how to respond to cases that come forward. 	<p>Prepare, adopt and publicly disclose the SEAH Prevention and Response Action Plan before Project effectiveness</p> <p>Implement the SEAH-PRAP throughout Project implementation.</p>	<p>PCU</p>
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4.3	<p>SECURITY PERSONNEL:</p> <p>The Recipient shall prepare, adopt, and implement area-specific Security Risk Assessments (SRAs) consistent with the requirements of ESS4, in a manner acceptable to the Association.</p> <p>The Recipient shall prepare, adopt, and implement a Project-wide Security Management Framework consistent with the requirements of ESS4, in a manner acceptable to the Association.</p>	<p>Conduct SRAs before commencement of sub-projects</p> <p>Prepare and adopt a Security Management Framework before Project effectiveness</p>	PCU
4.4	<p>TRAFFIC AND ROAD SAFETY</p> <p>Incorporate measures to manage traffic and road safety risks as required in the ESMPs to be prepared under action 1.3 above.</p>	On timeframe specified in action 1.3.	PCU

ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT

5.1	<p>Ensure consistency of any Project-related land acquisition with ESS5. Unless otherwise agreed in writing with the Association and subject to the preparation of the necessary E&S instruments pursuant to ESS5, civil works shall only proceed where Federal Member States can demonstrate availability of land for construction, with evidence acceptable to the Association of legal titling and land free from encumbrances or occupation by other parties. To this end, the project shall undertake independent screening to ascertain and validate the proposed government land location and identification of any potential risks.</p>		
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ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES

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6.1	Prepare, adopt, and implement measures and actions to assess and manage specific risks and impacts on biodiversity, that may be affected by the proposed construction. These measures shall be included in the ESMF and the respective ESMPs to meet the requirements of ESS6 and the national laws and international conventions that Somalia is a party to, in a manner acceptable to the Association. Should the project utilize raw materials for construction activities, the Recipient shall ensure that material shall be sourced through measures specified in Good International Industry Practices (GIIPs) and in the General Environmental, Health and Safety Guidelines of the International Development Association.	Prior to commencement of civil works of respective subproject.	PCU
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	This standard is not relevant. But the project shall rely on social assessment to confirm the presence of IP/Sub-Saharan Historically Underserved Traditional Local Communities to determine the applicability of ESS 7 or the adoption of other inclusion measures consistent with ESS 1 and, or ESS 10.	As per timelines in 1.3	
ESS 8: CULTURAL HERITAGE			
8.1	<p>CULTURAL HERITAGE AND CHANCE FINDS: Consistent with ESS8, ensure that measures to assess and manage the cultural heritage impacts of the Project are included in the ESMF and in ESMPs for subprojects and that such measures are adopted and implemented in a manner acceptable to the Association.</p> <p>Prepare, adopt, and implement chance finds procedures as part of the ESMF and the ESMPs developed for sub-projects.</p>	<p>On timeframes specified in action 1.3.</p> <p>Carry out the ESMPs, including complying with chance finds procedures, throughout Project implementation.</p>	PCU
ESS 9: FINANCIAL INTERMEDIARIES			
9.1	Not relevant to the project		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			

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10.1	<p>STAKEHOLDER ENGAGEMENT PLAN (SEP) PREPARATION AND IMPLEMENTATION: Prepare, disclose and implement a SEP, in a manner acceptable to the Association.</p>	<p>SEP has been prepared prior to Project appraisal and approved and shall be updated regularly throughout Project implementation.</p>	<p>PCU</p>
10.2	<p>PROJECT GRIEVANCE MECHANISM: Implement a functioning, trusted and accessible Project GRM, in line with the SEP.</p> <p>Accessible grievance arrangements shall be made publicly available to receive and facilitate resolution of concerns and grievances in relation to the Project, consistent with ESS10, in a manner acceptable to the Association.</p>	<p>Implemented throughout Project period. The GRM shall be operational before disbursement of funds under Component 3</p>	<p>PCU</p>
11	<p>Capacity Support (Training)</p>		<p>PCU</p>

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<p>A preliminary capacity assessment for the implementation of the E&S requirements shall be carried out as part of the ESMF preparation and shall be updated as necessary following the recruitment and induction of E&S specialists. The capacity assessment shall include terms of reference, an action plan, and the timeline for capacity building activities, including training and mentorship, in the following areas: The International Development Association’s Environmental and Social Framework in general; and specifically, on:</p> <ul style="list-style-type: none"> - procedural framework for project screening and appraisal. - feasibility and prepare specifications for concession tender and large procurement. - stakeholder mapping and engagement. - training in monitoring and supervision of the implementation of E&S instruments. - occupational and community health and safety issues - labor management - Specific aspects of environmental and social assessment including preparation of E&S instruments such as ESMF and ESMPs, Gender Based Violence (GBV); and Grievance Management. 	<ul style="list-style-type: none"> - Part of the ESMF, and cleared before Project effectiveness. - Training shall be carried out throughout the Project as required in accordance with the capacity assessment. 	<p>PCU</p>
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