

## **Federal Republic of Somalia**



### **MINISTRY OF FINANCE**

## **Somalia Enhancing Public Resource Management Project SERP (P177298)**

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

**March, 2022**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Federal Republic of Somalia (“Recipient”), through the Ministry of Finance (MoF) will implement the **Somalia Enhancing Public Resource Management Project (P177298)** (hereinafter known as “**the Project**” or “**SERP**”). The International Development Association (IDA, hereinafter “**the Association**”) has agreed to provide financing for the Project.
2. The Recipient will implement material measures and actions so that the Project is implemented in accordance with the Environmental and Social Standards (**ESSs**) of the World Bank. This Environmental and Social Commitment Plan (**ESCP**) sets out material measures and actions, any specific documents or plans, as well as the timing for each of these.
3. The Recipient will also comply with the provisions of any other E&S documents required under the ESF and referred to in this ESCP, including Stakeholder Engagement Plan (SEP), Environmental and Social Management Plan(ESMP), including about Management Procedures (LMP), Security Management Plan, SEA/SH Prevention and Response Action Plan, and Environmental and Social Management Plans (ESMPs).
4. The Recipient is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the Ministry, agency or unit referenced in 1. above.
5. Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the Association by the Recipient as required by the ESCP and the conditions of the legal agreement, and the Association will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
6. As agreed by the Association and the Recipient, this ESCP may be revised from time to time during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to assessment of Project performance conducted under the ESCP itself. In such circumstances, the Recipient through the Minister responsible for Finance will agree to the changes with the Association and will update the ESCP to reflect such changes. Agreement on changes to the ESCP will be documented through the exchange of letters signed between the Association and the Recipient through the Minister responsible for Finance. The MoF will promptly disclose the updated ESCP on its publicly accessible website.
7. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, the Recipient shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts, which may include environmental, health, and safety impacts, labor influx, gender-based violence (GBV) or sexual exploitation and abuse (SEA).

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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<b>MONITORING AND REPORTING</b>			
A	<p><b>REGULAR REPORTING</b></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&amp;S documents required under the ESCP; stakeholder engagement activities; and functioning of the grievance redress mechanism.</p>	<p>Quarterly throughout project implementation.</p>	<p>Project Coordination Unit (PCU),</p>
B	<p><b>INCIDENTS AND ACCIDENTS NOTIFICATION</b></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.</p> <p>Provide sufficient details regarding the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and supervising entity, as appropriate.</p> <p>Subsequently, as per 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 within 48 hours of the occurrence of the incident or accident.</p> <p>A report would 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>
C	<p><b>CONTRACTORS MONTHLY REPORTS</b></p> <p>As per the Association's request, provide to the Association the contractors' and design and supervision consultants' monthly monitoring reports on E&amp;S implementation submitted to the PSC.</p>	<p>Monthly preparation of the reports.</p> <p>Upon request by the Association.</p>	<p>PCU</p>
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			

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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.1	<p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>Establish and maintain an organizational structure at PIU at the Federal Government of Somalia (FGS) level with qualified one Environmental Specialist and one Social Specialist, each with more than five (5) years of experience in carrying out environmental and social assessments of projects.</p> <p>Mobilize additional staff on short-term or long-term assignment in accordance with project needs, including subject matter specialists on Gender Based Violence (GBV)/Sexual exploitation and Abuse (SEA), labor conditions (occupational health &amp; safety), and social inclusion. These could be seconded from other Ministries or agencies or through cross-support from a Bank-supported projects or directly hired for the Project.</p>	<p>Not later than two months after the Effective Date and retained throughout Project implementation.</p>	<p>PCU</p>
1.2	<p><b>ENVIRONMENTAL AND SOCIAL ASSESSMENT</b></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 ESMPs and monitoring arrangements.</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><b>MANAGEMENT TOOLS AND INSTRUMENTS</b></p> <p>Assess the environmental and social risks and impacts of proposed Project activities, in accordance with ESS1 and the Environmental and Social Management Plan (ESMP), Labour Management Procedures (LMP), SEAH Prevention and Response Action Plan (SEAH-PRAP), and Security Management Plan (SMP) to be prepared, disclosed, and adopted for the Project to ensure 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>The ESMP will detail measures necessary for construction and rehabilitation of government offices and facilities under this Project. The Recipient shall prepare, adopt and publicly disclose the ESMP in a manner satisfactory to the Association.</p> <p>Prepare a Stakeholder Engagement Plan (SEP) as necessary, and publicly disclose and implement, including Grievance Redress Mechanism (GRM) and in a manner satisfactory to the Association.</p>	<p>ESMP, LMP, SEAH-PRAP, and SecMP to be prepared, disclosed and adopted not later than three months after the Effective Date. Contractors to prepare C-ESMPs before commencement of works. Assessment to be conducted before the carrying out of the relevant Project activities.</p> <p>Before the carrying out of the relevant Project activities, and thereafter throughout the carrying out of such activities.</p> <p>Before the carrying out of the relevant Project activities, and thereafter throughout the carrying out of such activities</p>	PCU

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<p>1.4</p>	<p><b>MANAGEMENT OF CONTRACTORS:</b></p> <p>Incorporate the relevant aspects of the ESCP, including the relevant E&amp;S documents and plans (i.e. ESMPs), and the Labour Management Procedures and Security Management Plan, 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 recruited to carry out civil works including ensuring that:</p> <ul style="list-style-type: none"> <li>• Contractors comply with the national laws, e.g., licenses to operate and excavate any sites for project purposes.</li> <li>• 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.</li> <li>• Contractors submit an ESMP including all E&amp;S requirements as part of the bidding process and show that they have sufficient staff and capacity to carry it out.</li> <li>• Contractors are made aware of requirements for Codes of conduct (CoCs), which applies also to subcontractors, primary suppliers and their workers and which cover conditions of service, occupational health and safety (OHS), gender-based violence (GBV) and security requirements.</li> <li>• Contractors’ commitment and compliance with ESSs are monitored.</li> <li>• There is provision of GRM for contractors and subcontractors, primary suppliers, communities and other stakeholders as well as employees.</li> </ul>	<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"> <li>Contractors and primary suppliers provide details on their oversight on environmental, social, health and safety (ESHS) performance and adequate mechanisms for serious incident reporting should it be required.</li> <li>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 LMP, SEAH Prevention and Response Action Plan, and Security Management Plan.</li> </ul>		
1.5	<p><b>TECHNICAL ASSISTANCE</b></p> <p>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.</p>	Throughout Project implementation.	PCU
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			

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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
2.1	<p><b>LABOR MANAGEMENT PROCEDURES (LMP)</b> Develop LMP to address labour risks, including (but not limited to)</p> <ul style="list-style-type: none"> <li>▪ conditions of service.</li> <li>▪ code of conduct.</li> <li>▪ occupational, health and safety (OHS) measures.</li> <li>▪ Covid-19 prevention measures.</li> <li>▪ prevention of child and forced labour.</li> <li>▪ emergency preparedness and response.</li> <li>▪ grievance redress mechanism for project workers.</li> <li>▪ training of project workers on key issues including OHS and GBV prevention.</li> <li>▪ management of labor influx.</li> </ul>	LMP to be prepared and cleared by the Association not later than three months after Project effectiveness.	PCU
2.2	<p><b>GRIEVANCE REDRESS MECHANISM FOR PROJECT WORKERS</b> 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>	Grievance redress mechanism to be operational prior to engaging Project workers. The mechanism to be maintained throughout Project implementation.	PCU
2.3	<p><b>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</b> Develop and implement occupational, health and safety (OHS) measures, based on World Bank EHS Guidelines, as part of the ESMP including through, <i>inter alia</i>, implementing adequate OHS measures and incorporating Labour Management Procedures and Security Management Plan and SEAH Prevention and Response Action Plan requirements into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms.</p>	Measures to be operational prior to engaging Project workers.	PCU



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ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT		
3.1	<p><b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT:</b> Resource efficiency and pollution prevention and management measures will be covered under the ESMPs to be prepared under the clause 1.3 above.</p>	<p>Prepare, adopt and publicly disclose the ESMPs prior to implementation of site-specific subprojects.</p> <p>Monitor implementation of the ESMPs throughout Project implementation.</p>
ESS 4: COMMUNITY HEALTH AND SAFETY		
4.1	<p><b>COMMUNITY HEALTH AND SAFETY:</b> 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 the new facilities to be upgraded under this Project, if any, 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>Prepare, adopt and publicly disclose the ESMPs prior to implementation of site-specific subprojects. Monitor implementation throughout Project implementation.</p>

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<p>4.2</p>	<p><b>GBV AND SEA RISKS:</b> Prepare, adopt, publicly disclose and implement a stand-alone project wide SEAH Prevention and Response Action Plan. Key measures include:</p> <ul style="list-style-type: none"> <li>▪ 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.</li> <li>▪ Mapping and development of partnerships with identified GBV service providers.</li> <li>▪ A Reporting and Response Framework that outlines key requirements for reporting cases if they arise and measures to enable safe, ethical, survivor-centered response.</li> <li>▪ An Accountability Framework that outlines how the PSC/contractor will handle allegations, including related to investigation (in alignment with national processes) and sanctions for potential perpetrators.</li> <li>▪ 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.</li> </ul>	<p>Prepare, adopt and publicly disclose the SEAH Prevention and Response Action Plan not later than three months after Project effectiveness.</p> <p>Implement the Action Plan throughout Project implementation.</p>	<p>PCU</p>
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4.3	<p><b>SECURITY PERSONNEL:</b></p> <p>Prepare, adopt, and implement a Project-wide Security Management Plan consistent with the requirements of ESS4, in a manner acceptable to the Bank.</p> <p>Prepare, adopt, and implement a Project-wide Security Risk Assessment and Management Plan consistent with the requirements of ESS4, in a manner acceptable to the Bank.</p>	<p>Prepare and adopt a Security Management Plan not later than three months after Project effectiveness.</p> <p>Implement the Action Plan throughout Project implementation</p>	PCU
4.4	<p><b>TRAFFIC AND ROAD SAFETY</b></p> <p>Incorporate measures to manage traffic and road safety risks as required in the ESMP to be prepared under action 1.3 above.</p>	<p>Prior to implementation of site-specific subprojects.</p>	PCU

<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>			
5.1	<p>This standard is not relevant. Activities relating to the use of Land Acquisition, Restrictions on Land Use and Involuntary Resettlement currently not being considered under this project. Civil works will only proceed where Federal member states can demonstrate availability of land for construction, with prima facie evidence of legal titling and land free from encumbrances or occupation by other parties.</p>		
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
6.1	<p>This standard is not relevant. Activities relating to the use of Biodiversity Conservation and Sustainable Management of Living Natural Resources currently not being considered under this project</p>		
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>			
7.1	<p>This standard is not relevant, as there are no persons that meet the identification criteria for IP/SSAHUTLCs</p>		
<b>ESS 8: CULTURAL HERITAGE</b>			

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8.1	<p><b>CULTURAL HERITAGE AND CHANCE FINDS:</b> Consistent with ESS8, ensure related measures are included in the Environmental and Social Management Plans (ESMPs) for subprojects and that such measures are adopted and implemented in a manner acceptable to the Association.</p> <p>Prepare, adopt, and implement - if applicable - the chance finds procedure described in the ESMPs developed for sub-projects.</p>	<p>Prepare, adopt and publicly disclose the ESMPs prior to implementation of site-specific subprojects</p> <p>Carry out the ESMPs, including complying with chance finds procedures, throughout Project implementation.</p>	PCU
<b>ESS 9: FINANCIAL INTERMEDIARIES</b>			
9.1	Not relevant to the project		
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<p><b>STAKEHOLDER ENGAGEMENT PLAN (SEP) PREPARATION AND IMPLEMENTATION:</b> Prepare, disclose and implement a SEP, in a manner acceptable to the Association.</p>	SEP has been prepared prior to Project appraisal and shall be updated regularly throughout Project implementation.	PCU
10.2	<p><b>PROJECT GRIEVANCE MECHANISM:</b> Ensure a functioning, trusted and accessible Project GM, 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>	Implemented throughout Project period.	PCU
<b>CAPACITY SUPPORT</b>			

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CS1	<p>[Specify Training to be provided and targeted groups For example, training may be required for [e.g. PIU staff, stakeholders, communities, Project workers] on:</p> <ul style="list-style-type: none"> <li>• stakeholder mapping and engagement</li> <li>• specific aspects of environmental and social assessment</li> <li>• emergency preparedness and response</li> </ul> <p>community health and safety.]</p>		PCU
CS2	<p>[Specify training for Project workers on occupational health and safety including on emergency prevention and preparedness and response arrangements to emergency situations.]</p>		PCU