

FEDERAL GOVERNMENT OF SOMALIA



BAXNAANO
National Safety Net Programme

Ministry of Labor & Social Affairs (MoLSA)

PROJECT:

**SOMALIA SHOCK-RESPONSIVE SAFETY NET FOR HUMAN
CAPITAL PROJECT**

**UPDATED DRAFT ENVIRONMENTAL and SOCIAL
COMMITMENT PLAN (ESCP)**

Updated for the Third Additional Financing (P181469)

Updated in October 2023

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Federal Government of Somalia (Borrower) is implementing Somalia Shock-Responsive Safety Net for Human Capital Project (the Project), with the involvement of the Ministry of Labor & Social Affairs (MoLSA); as set out in the Financing Agreement. The International Development Association (the Association) has agreed to provide financing for the **Somalia Shock-Responsive Safety Net for Human Capital Project (P171346)**, **Somalia Shock-Responsive Safety Net for Human Capital Project II (P178730)** and Somalia Shock Responsive Safety Net for Human Capital Project Third Additional Financing (P181469) as set out in the referred agreement. This ESCP supersedes previous versions of the ESCP for the Project and shall apply both to the original and the additional financing for Project referred to above. MoLSA has contracted the World Food Programme (WFP) and the United Nations Children's Fund (UNICEF) to support the implementation of the parent project. The International Development Association (the Association) has agreed to provide financing for the Project.
2. The Borrower 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 Financing Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreement(s).
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Borrower 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 a form, substance, and manner acceptable to the Association. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the Association.
4. As agreed by the Association and the Borrower, this ESCP will 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 Borrower through MoLSA and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Borrower Project Manager of MoLSA. The Borrower shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
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 instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism(s)</p>	<p>Submit quarterly reports to the Association throughout the first year of Project implementation commencing after the Effective Date and biannually thereafter throughout Project implementation. Submit each report to the Association no later than 21 days after the end of each reporting period.</p>	MOLSA PIU
B	<p>INCIDENTS AND ACCIDENTS</p> <p>Promptly notify any incident or accident related or having an impact on the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers. Provide sufficient detail regarding the incident or accident, indicating immediate measures taken to address it, and include information provided by any contractor and supervising entity, as appropriate, following such classification and reporting guidance as the Association may provide.</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>Report all other incidents to the Association in quarterly reports.</p>	<p>Notify the Association within 48 hours of learning of an incident or accident.</p> <p>Provide subsequent report within a timeframe acceptable to the Association.</p> <p>Quarterly and maintained throughout Project implementation</p>	MOLSA PIU
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>Establish and maintain a Project Implementation Unit (PIU) with qualified staff and resources to support management of ESHS risks and impacts of the Project including a Social Development Specialist, an Environmental Specialist and Grievance Redress Operators</p> <p>Mobilize additional staff on short-term or long-term assignment in accordance with ESMF institutional assessment/needs, including subject matter specialists on GBV/SEA, labor conditions (health & safety), and social inclusion, as necessary to ensure that the Project is implemented in accordance with the ESSs and this ESCP.</p>	<p>PIU already set up with a social specialist and 2 GRM operators. Engage an Environmental specialist no later than the Effective Date and thereafter maintain throughout Project implementation.</p> <p>Timeframe as agreed with the Association and specified in the PIM.</p>	MOLSA PIU
1.2	<p>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</p>		MOLSA PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>1. Adopt and implement an Environmental and Social Management Framework (ESMF), Labor Management Procedures (LMP), SEA/SH Prevention and Response Action Plan (SEA/SH PRAP), Security Risk Assessment Management Framework (SRAMF), and E-Waste Management Plan (EWMP) for the Project consistent with the relevant ESSs..</p> <p>2. Cause contractors to adopt the ESMF consistent with the relevant ESSs and as part of their service contracts. Ensure the implementing partners carry out the Project in accordance with the ESS and this ESCP. These contracts shall be monitored and enforced by MoLSA, as necessary.</p>	<p>ESMF, LMP, SEA/SH-PRAP, and SRAMF, and EWMP to shall be prepared, disclosed, consulted upon and adopted prior to the disbursement of related activities, and thereafter implemented throughout Project implementation..</p> <p>Prior to the engagement of contractors and maintained throughout project implementation.</p>	
1.4	<p>TECHNICAL ASSISTANCE</p> <p>Ensure that the consultancies, studies (including feasibility studies, if applicable), 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.	MOLSA PIU
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Adopt and implement the 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.</p>	Adopt the updated LMP in a similar timeframe as 1.2	MOLSA PIU
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.</p>	GRM for the parent project is operational. To be enhanced for activities under the AF in a in a similar timeframe as 1.2	MOLSA PIU
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>MANAGEMENT OF WASTE AND HAZARDOUS MATERIALS:</p> <p>As part of the ESMF, develop and implement measures and procedures for managing waste and hazardous materials from the CCC.</p>	Adopt the Waste Management Plan in a similar timeframe as 1.2	

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
3.2	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p> <p>Ensure that any waste generated by the Project is managed in accordance with ESS3. In particular, ensure that e-waste is segregated from other forms of waste and is taken to licensed refurbishers, collection centers or recyclers. Where applicable, procurement procedures shall consider the possibility of refurbishment as part of the selection process for procurement of computers. These procedures shall be included in the Project Operations Manual.</p>	Project Operations Manual already in place. To be maintained throughout project implementation	MOLSA PIU
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.2	<p>COMMUNITY HEALTH AND SAFETY</p> <p>Assess and manage specific risks and impacts to the community arising from Project activities and include mitigation measures in the ESMF</p>	In a similar timeframe as 1.2. Maintained throughout Project implementation.	MOLSA PIU
4.3	<p>SEA AND SH RISKS</p> <p>Adopt and implement a SEA/SH Action Plan as part of the ESMF, to assess and manage the risks of SEA and SH.</p>	Update the SEA/SH Action Plan in a similar timeframe as 1.2 Maintained throughout Project implementation.	MOLSA PIU
4.4	<p>SECURITY MANAGEMENT</p> <p>Assess and implement measures to manage the security risks of the Project, including the risks of engaging security personnel to safeguard project workers, sites, assets, and activities in the Security Risk Assessment Management Framework (SRAMF) , guided by the principles of proportionality and GIIP, and by applicable law, in relation to hiring, rules of conduct, training, equipping, and monitoring of such personnel</p>	Adopt the SRAMF in a similar timeframe as 1.2 . Maintained throughout Project implementation.	MOLSA PIU
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
This standard is not currently relevant for the Project.			
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
This standard is not currently relevant for the Project.			
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
This standard is not currently relevant for the Project.			
ESS 8: CULTURAL HERITAGE			
This standard is not currently relevant for the Project.			
ESS 9: FINANCIAL INTERMEDIARIES [This standard is only relevant for Projects involving Financial Intermediaries (FIs).]			
This standard is not currently relevant for the Project.			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</p> <p>Adopt and implement a Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, which shall 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.</p>	SEP already in place. Conduct additional stakeholder engagements for AF activities and update the SEP in a similar timeframe as 1.2. To be implemented, and updated as necessary, throughout Project implementation	MOLSA PIU
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>Establish, publicize, maintain, and operate an accessible grievance mechanism, 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>	Project Grievance Mechanism established. To be enhanced for activities under the AF no later than Effective Date. Maintained throughout Project implementation	MOLSA PIU
CAPACITY SUPPORT (annual and on demand)			
CS1	<p>The following training sessions have been conducted and shall continue under the Project as required.</p> <p>PIUs: Environmental and Social Awareness training in the ESF E&S focal points will require training on their obligations under the ESMF and reporting. NGOs contracted to WFP: Stakeholder mapping and engagement Obligations under the ESMF Obligations for reporting incidents to the client Labor management procedures Gender Based Violence awareness and accountability training</p> <ul style="list-style-type: none"> • Emergency preparedness and response 	Three months commencing after the Effective Date. To continue throughout Project implementation on demand	MOLSA PIU