

**Somalia Recurrent Cost & Reform Financing
Project - Phase 3 (P173731)**

and

Additional Financing (P177900)

and

Second Additional Financing (P181407)

Borrower

Federal Ministry of Finance of Somalia

Project Implementing Entity

Federal Ministry of Finance of Somalia

[Draft]

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

19th February 2024

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Federal Government of Somalia (FGS) through the Federal Ministry of Finance is planning to implement the Somalia Recurrent Cost & Reform Financing Project - Phase 3 (the Project), with the involvement of the Federal Member States Ministries of Finance. The International Development Association (the Association) has agreed to provide financing for the Project. This Environmental and Social Commitment Plan (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.
2. The FGS shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this 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 FGS 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 ESSs, and in form and substance, and in a 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 FGS, 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 FGS through the Ministry of Finance of Somalia and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the FGS, Minister of Finance of Somalia. The FGS 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>Quarterly reports to the Association throughout Project implementation, commencing after the Effective Date. Submit each report to the Association no later than 15 days after the end of each reporting period.</p>	<p>Ministry of Finance Somalia</p>
B	<p>INCIDENTS AND ACCIDENTS</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 and sexual harassment (SEA/SH), and accidents that result in death, serious, or multiple injury. Provide sufficient detail 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/or supervising firm, as appropriate.</p> <p>Subsequently, at the Association’s request, prepare a report on the incident or accident and propose any measures to address it and prevent its recurrence.</p>	<p>Notify the Association no later than 48 hours after learning of the incident or accident.</p> <p>Provide subsequent report to the Association within a timeframe acceptable to the Association.</p>	<p>Ministry of Finance Somalia</p>
ESS1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>Establish and maintain a national Project Implementation Unit (PIU) with qualified staff and resources to support management of ESHS risks and impacts of the Project, including one senior social/GBV specialist and a security risk management consultant, and one social/GBV specialist in each Federal Member State (FMS).</p>	<p>The PIU shall be maintained throughout Project implementation.</p>	<p>Ministry of Finance Somalia, FGS and FMSs</p>
1.2	<p>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</p> <p>1. Update, consult on and disclose an update of the Environmental and Social Management Framework (ESMF) including an E-waste plan and SEA/SH prevention and response plan, consistent with the relevant ESSs satisfactory to the Association.</p>	<p>Update and adopt the ESMF prior to the Effective Date and thereafter implement throughout Project implementation.</p>	<p>Ministry of Finance Somalia</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>2. Prepare, publicly consult, disclose, adopt, and implement a Medical Waste Management Plans, Environmental and Social Management Plans (ESMPs) and/or other instruments, if required for the respective Project AF activities based on the screening and assessment process, in accordance with the ESSs, the ESMF, the World Bank Group Environmental Health and Safety Guidelines (EHSGs) and other relevant Good International Industry Practice (GIIP) including relevant World Health Organization (WHO) guidelines related to COVID-19, in a manner acceptable to the Association.</p>	<p>Adopt instruments before carrying out relevant Project activities.</p>	
<p>1.3 EXCLUSIONS Specify in the grant manual agreement to be signed between FGS and FMS eligible activities and E&S requirements in accordance with the ESMF. Exclude the following type of activities as ineligible for financing under the Project:</p> <ul style="list-style-type: none"> a. Any infrastructure works beyond minor rehabilitation will be excluded from the Project under AF component 2.4. b. Activities that may cause long term, permanent and/or irreversible adverse impacts (e.g., loss of a natural habitat). c. Activities that have high probability of causing serious adverse effects to human health and/or the environment not related to treatment of COVID-19 cases. d. Activities that may have significant adverse social impacts and may give rise to significant social conflict. e. Activities that involve adverse impacts for people and communities described in ESS7. f. Activities that may affect lands or rights of Vulnerable and Marginalized Groups or other vulnerable minorities. g. Activities that may involve permanent resettlement or land acquisition or adverse impacts on cultural heritage. <p>All the other excluded activities are set out in the ESMF.</p>	<p>During the assessment process conducted under action 1.2 above.</p>	<p>Ministry of Finance Somalia</p>
<p>1.4 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 and consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.</p>	<p>Throughout Project implementation.</p>	<p>Ministry of Finance Somalia</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
ESS2: LABOR AND WORKING CONDITIONS			
2.1	The Labor Management Procedures (LMP) will be updated, disclosed, adopted, and implemented.	Updated and disclosed before Effective Date, and thereafter implemented throughout Project implementation.	Ministry of Finance Somalia
2.2	The Project shall be carried out in accordance with the applicable requirements of ESS2, in a manner acceptable to the Association, including through, inter alia, implementing adequate occupational health and safety measures, including emergency preparedness and response measures, setting out grievance arrangements for Project workers, and incorporating labor requirements into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms.	Throughout Project implementation.	Ministry of Finance Somalia
ESS3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	Without prejudice to the prohibition in action 1.3b above, relevant aspects of this standard shall be considered, as needed, under action 1.2 above, including, inter alia, measures to: manage health care wastes and other types of hazardous and non-hazardous wastes as described in the ESMF and the medical waste management plan. Update ESMF to cover potential e-waste concerns by covering management of e-waste.	Throughout Project implementation. The ESMF will be updated and disclosed before Effective Date.	Ministry of Finance Somalia
ESS4: COMMUNITY HEALTH AND SAFETY			
4.1	Without prejudice to the prohibition in action 1.3b above, relevant aspects of ESS4 shall be considered, as needed, under action 1.2 above, including, inter alia, measures to: minimize the potential for community exposure to communicable diseases; 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; manage the risks of the use of security personnel, if any; manage the risks of labor influx; and prevent and respond to cases of SEA/SH.	Throughout Project implementation.	Ministry of Finance Somalia
4.3	SEXUAL EXPLOITATION AND ABUSE AND SEXUAL HARRASSMENT RISKS (SEA/SH) The SEA/SH Prevention and Response Action Plan will be updated, disclosed, adopted, and implemented to assess and manage the risks of SEA and SH.	Updated and disclosed before Effective Date, and thereafter implemented throughout Project implementation.	Ministry of Finance Somalia

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
4.4	<p>SECURITY MANAGEMENT</p> <p>A security risk management consultant will be employed to assess and implement measures to manage the security risks of the Project related to the ESHS aspects of the Project, including the risks of engaging security personnel for project workers, sites, assets, and activities, as set out in a Security Risk Assessment and Security Management Plan using 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>	Hiring of a security risk management consultant and update the security risk assessment and management plan before the effective date. Security risk assessment and management plan and guidelines should be implemented throughout Project implementation.	Ministry of Finance Somalia
ESS5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
	ESS5 is not relevant for the Project.		
ESS6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
	ESS6 is not relevant for the Project.		
ESS7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	Where groups fitting the ESS7 criteria are present in the Project areas, measures shall be taken to include female health workers (FHWs) of those communities and consultant them in 2.4 activities, along with the applicable measures defined in the Project's ESHS instruments.	Throughout Project implementation.	Ministry of Finance Somalia
ESS8: CULTURAL HERITAGE			
	ESS8 is not relevant for the Project.		
ESS9: FINANCIAL INTERMEDIARIES			
	ESS9 is not relevant for the Project.		
ESS10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</p> <p>Adopt and implement the updated 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>	The SEP was updated, consulted upon and disclosed before appraisal, on March, 2024.	Ministry of Finance Somalia
10.2	<p>STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE:</p> <p>Implement the Stakeholder Engagement Plan (SEP) consistent with ESS10, including the use of different, culturally appropriate communication approaches to ensure communication also with the most vulnerable, including illiterate and people with disabilities and hard to reach communities.</p>	Throughout Project implementation.	Ministry of Finance Somalia

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>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> <p>The Grievance Mechanism overview should be updated with enhanced trust building measures and a report of all grievances received in the past year, how they were resolved and whether the complainants were satisfied with the resolution.</p>	<p>Throughout Project implementation.</p> <p>GM overview and report on grievance resolution in the past year submitted to the Association before the effective date.</p>	<p>Ministry of Finance Somalia</p>
CAPACITY SUPPORT			
CS1	<p>Training topics for personnel involved in Project implementation shall, among others, include:</p> <ul style="list-style-type: none"> • Stakeholder engagement • Relevant World Bank ESSs • Occupational and Community Health and Safety • Medical waste management • E-waste management • Application of the Project ESMF • SEA/SH and Gender-Based Violence Risk Mitigation • Grievance Management • Labor Management Procedures • Security Management Plan 	<p>Throughout Project implementation.</p>	<p>Ministry of Finance Somalia</p>