

**DRAFT**

**Borrower**

**Federal Ministry of Finance of Somalia**

**Project Implementing Entity**

**Federal Ministry of Finance of Somalia**

**Somalia Recurrent Cost & Reform Financing**

**Project - Phase 3 (P173731)**

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

**22<sup>nd</sup> APRIL 2020**

**Borrower: Federal Ministry of Finance of Somalia**  
**Project Implementing Federal Ministry of Finance of Somalia**  
**Project Title: Somalia Recurrent Cost & Reform Financing Project - Phase 3 (P173731)**

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

1. The Federal Government of Somalia (FGS) is planning to implement the Somalia Recurrent Cost & Reform Financing Project - Phase 3 (the **Project**), with the involvement of Federal Ministry of Finance of Somalia. The World Bank has agreed to provide financing for the Project.
2. The FGS will implement material measures and actions so that the Project is implemented in accordance with the World Bank Environmental and Social Standards (**ESSs**). This Environmental and Social Commitment Plan (**ESCP**) sets out a summary of the material measures and actions.
3. In particular, this ESCP requires compliance with the provisions set out in the Stakeholder Engagement Plan, Environmental and Social Management Framework, Labor Management Procedures and GBV action plan to be developed for the Project.
4. The table below summarizes the material measures and actions that are required as well as the timing of the material measures and actions. The FGS is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by other Ministries or FMS.
5. Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the Bank by the FGS as required by the ESCP and the conditions of the legal agreement, and the Bank will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
6. As agreed by the Bank and the FGS, 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 FGS will agree to the changes with the Bank 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 Bank and the FGS. The FGS will promptly disclose the updated ESCP.
7. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, the FGS shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts.

Somalia Recurrent Cost & Reform Financing Project - Phase 3 ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN As of 22nd April, 2020				
<i>Summary of the Material Measures and Actions to Mitigate the Project's Potential Environmental and Social Risks and Impacts</i>		<i>Timeframe</i>	<i>Responsibility / Authority and Resources/Funding Committed</i>	<i>Date of Completion</i>
<b>ESCP Monitoring and Reporting</b>				
0.1	<b>REGULAR REPORTING:</b> Prepare and submit regular monitoring reports on the safeguard's performance of the Project, including, inter alia, implementation of the ESCP, and any E&S documentation prepared or to be prepared and implemented under the ESCP, in form and substance acceptable to the Association.	Quarterly (every 3 months) reports submitted to the Association throughout Project Implementation.  Mid-term and completion reports will also be required at times determined during project implementation.	Project Implementation Unit (PIU)  The cost of monitoring and reporting will be incorporated the overall Project management costs	Throughout Project implementation  First reporting to complete within three months following the project effectiveness
0.2	<b>INCIDENTS AND ACCIDENTS NOTIFICATION:</b> 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.	Promptly after taking notice of the incident or accident.  Any incident or accident shall be notified to the Association within 24 hours after taking note of the incident or accident	PIU  Funding from Project Budget	Promptly after taking notice of the incident or accident.
<b>SUMMARY ASSESSMENT</b>				

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<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>				
1.1	<p><b>ORGANIZATIONAL STRUCTURE:</b> A Project implementation unit (PIU) will be set up within the Ministry of Finance</p> <ul style="list-style-type: none"> <li>Separate social and environmental safeguard specialists and a GBV specialist in MoF at FGS level and social and environmental specialists in each FMS PIU.</li> </ul>	<ul style="list-style-type: none"> <li>PIU: Prior to project effectiveness</li> </ul>	PIU	<ul style="list-style-type: none"> <li>PIU: Project effectiveness date</li> </ul>
1.2	<p><b>MANAGEMENT TOOLS AND INSTRUMENTS:</b> Prepare, consult on and disclose an Environmental and Social Framework (ESMF) including a medical waste management plan (MWMP) satisfactory to the World Bank.</p> <p>Develop, adopt and disclose a Stakeholder Engagement Plan (SEP, including GRM), satisfactory to the World Bank.</p> <p>Develop, adopt and disclose a GBV action plan, satisfactory to the World Bank.</p>	<ul style="list-style-type: none"> <li>Prior to board approval</li> </ul>	<p>Responsibility: PIU Risk Management Team</p> <p>Funding: Project Funds</p>	<ul style="list-style-type: none"> <li>Throughout Project implementation</li> </ul>
1.3	<p><b>PERMIT, CONSENTS AND AUTHORIZATIONS:</b> Though none are anticipated, the project will obtain and thereafter comply with any permits, consents and authorizations that are required for the Project from relevant national authorities.</p>	All relevant permits, consents and authorizations: before commencement of related project activities	Ministry of Finance	<ul style="list-style-type: none"> <li>Securing permits as indicated and compliance with the permits throughout Project implementation.</li> </ul>
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>				

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2.1	<p><b>LABOR MANAGEMENT PROCEDURES (LMP):</b> Consistent with the LMP and ESS2, develop and implement labor management procedures to address labor risks, including (but not limited to) the following key mitigations:</p> <ul style="list-style-type: none"> <li>-Occupational, health and safety (OHS) measures;</li> <li>-Emergency preparedness and response;</li> <li>-Project workers training; and incorporation of relevant provisions of LMP into procurement documents</li> </ul>	Prior to board approval	<p>Responsibility: PIU Risk Management Team Accountability: Head of PIU</p> <p>Funding: Project Funds</p>	<ul style="list-style-type: none"> <li>• Throughout Project implementation</li> </ul>
2.2	<p><b>GRIEVANCE MECHANISM FOR PROJECT WORKERS:</b> Develop and maintain a grievance redress mechanism (GRM) for direct project workers, including SEA/SH confidential channels for contracted and primary suppliers as part of the LMP</p>	GRM operational prior to engaging project workers.	<p>Responsibility: PIU Risk Management Team</p> <p>Accountability: Head of PIU</p> <p>Funding: Project Funds</p>	<ul style="list-style-type: none"> <li>• Throughout Project implementation</li> </ul>
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT				
3.1	<p><b>MANAGEMENT OF WASTE AND HAZARDOUS MATERIALS:</b> Implement measures and procedures for managing medical waste in the Medical Waste Management Plan (MWMP).</p>	<p>Prior to start of project activities</p> <p>Maintained throughout Project implementation</p>	<p>Responsibility: PIU Risk Management Team</p> <p>Accountability: Head of PIU</p> <p>Funding: Project Funds</p>	Throughout Project implementation

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<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>				
Relevant provisions on ESS4 will be addressed in ESMF, SEP and LMP				
4.1	<p><b>COMMUNITY HEALTH AND SAFETY:</b> Measures and actions to assess and manage specific risks around infection control and healthcare waste management and impacts outlined in the ESMF.</p> <p>Awareness raising campaign will be undertaken to sensitize local communities against the reuse of needles, medicine bottles, and other used or expired medical supplies</p>	<p>Prior to project activities</p> <p>Maintained throughout Project implementation</p>	<p>Responsibility: PIU Risk Management Team</p> <p>Accountability: Head of PIU</p> <p>Funding: Project Funds</p>	<ul style="list-style-type: none"> <li>Maintained throughout Project implementation</li> </ul>
4.2	<p><b>GBV AND SEA RISKS:</b> Undertake gap assessment of GBV/SEA risks and identify mitigation measures and actions and develop and implement a GBV/SEA Action Plan. A GBV specialist will be hired by the PIU to ensure appropriate technical expertise for GBV/SEA risk management activities. GBV/SEA sensitive channels will be integrated into associated grievance mechanisms.</p>	<p>Prior to board approval</p>	<p>Responsibility: PIU Risk Management Team</p> <p>Accountability: Head of PIU</p> <p>Funding: Project Funds</p>	<ul style="list-style-type: none"> <li>Maintained throughout Project implementation</li> </ul>
4.3	<p><b>GBV AND SEA RISKS DURING PROJECT IMPLEMENTATION:</b></p> <p>There will be GBV procedures in place, including communications and sensitization, training and monitoring, pre-deployment and during project implementation. This will be defined in the ESMF and through a GBV/SEA/ Action Plan.</p>	<p>Prior to project activities and maintained throughout Project implementation</p>	<p>Responsibility: PIU Risk Management Team</p> <p>Accountability: Head of PIU</p> <p>Funding: Project Funds</p>	<ul style="list-style-type: none"> <li>Maintained throughout Project implementation</li> </ul>

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<p><b>SECURITY PERSONNEL.</b> Security personnel to be used to implement the project must adopt codes of conduct and trained on: use of force, GBV and SEA prevention. The ESMF will outline the risks and mitigation measures for use of security personnel to implement this Project.</p>		<p>Prior to project activities and maintained throughout Project implementation</p>	<p>Responsibility: PIU Risk Management Team Accountability: Head of PIU Funding: Project Funds</p>	<ul style="list-style-type: none"> <li>Maintained throughout Project implementation</li> </ul>
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>				
This standard is not relevant for the Project				
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>				
This standard is not relevant for the Project				
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>				
This standard is not relevant for the Project				
<b>ESS 8: CULTURAL HERITAGE</b>				
This standard is not relevant for the Project				
<b>ESS 9: FINANCIAL INTERMEDIARIES</b>				
This standard is not relevant for the Project				
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>				

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10.1	<b>SEP PREPARATION:</b> Prepare and disclose SEP, and continuously update.	<ul style="list-style-type: none"> <li>Draft by April 2020, finalised by board date and updated regularly throughout Project implementation</li> </ul>	Responsibility: PIU Risk Management Team  Accountability: Head of PIU  Funding: Project Funds	<ul style="list-style-type: none"> <li>Throughout project implementation</li> </ul>
10.2	<b>SEP IMPLEMENTATION:</b> Implement the SEP.	Prior to board date	Responsibility: PIU Risk Management Team  Accountability: Head of PIU  Funding: Project Funds	<ul style="list-style-type: none"> <li>Throughout project implementation</li> </ul>
10.3	<b>PROJECT GRIEVANCE MECHANISM:</b> Develop the Project Grievance Redress Mechanism, as part of the SEP	Prior to board date	Responsibility: PIU Risk Management Team  Accountability: Head of PIU  Funding: Project Funds	<ul style="list-style-type: none"> <li>Throughout Project implementation</li> </ul>
Capacity Support				
Specify Training to be provided		Specify Targeted Groups and Timeframe for Delivery	Specify Training Completed	



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All capacity building activities and trainings will be further detailed in the ESMF, trainings may be required in: <ul style="list-style-type: none"> <li>• Stakeholder engagement</li> <li>• World Bank ESS</li> <li>• Occupational and Community Health and Safety Code of conducts for security forces</li> <li>• Medical waste management</li> <li>• Gender-Based Violence Risk Mitigation</li> <li>• Grievance Management</li> <li>• Labor Management procedures</li> </ul>	PIU, project workers, Civil Servants		