

FEDERAL GOVERNMENT OF SOMALIA



Ministry of Labor & Social Affairs

**PROJECT: Additional Financing to Shock Responsive Safety Net for
Locust Response Project (SNLRP)**

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

May 31, 2021

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

Additional Financing to Shock Responsive Safety Net for Locust Response Project (SNLRP)

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Federal Government of Somalia (Recipient) is planning to implement the Somalia Shock-Responsive Safety Net for Human Capital Project Additional Financing (the Project), through a steering committee chaired by the Office of the Prime Minister and comprising of Office of the President; Ministry of Labor & Social Affairs (MoLSA); the Ministry of Finance; the Ministry of Planning, Investment and Economic Development; Ministry of Humanitarian Affairs and Disaster Management; Ministry of Education; Ministry of Health; Ministry of Energy and Water Resources; National Economic Council; National Commission for Refugees and Federal Member States representatives to ensure effective consultations and collaboration. In addition, MoLSA has contracted the World Food Programme (WFP) to support the implementation of the parent project. The contract with WFP shall be amended to incorporate expanded responsibilities under the Project. The International Development Association (the Association) has agreed to provide financing for the Project.
2. The Federal Government of Somalia shall 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 the material measures and actions, any specific documents or plans, as well as the timing for each of these.
3. The Federal Government of Somalia shall also comply with the provisions of any other environmental and social documents required under the ESF and referred to in this ESCP, such as Social Management Plan and Stakeholder Engagement Plan, and Labor Management Procedures, and the timelines specified in those E&S documents.
4. The Federal Government of Somalia is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by other Ministries, agencies or units, such as those referenced in 1 above, member states governments or by contractors.
5. Implementation of the material measures and actions set out in this ESCP shall be monitored and reported to the Association by the Federal Government of Somalia, through MoLSA, as required by this ESCP and the conditions of the legal agreement. 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 Federal Government of Somalia, 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 Federal Government of Somalia, through MoLSA, 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 MoLSA. MoLSA shall 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 Federal Government of Somalia shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts.

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ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN <i>Material Measures and Actions</i>			
MONITORING AND REPORTING			
A	REGULAR REPORTING Prepare and submit regular monitoring reports on the environmental, social, health and safety 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 upon request by the Association during Project implementation.	Responsibility: PIU Risk Management Team Accountability: Head of PIU Funding: Project Funds
B	INCIDENTS AND ACCIDENTS NOTIFICATION: 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. Subsequently, at the Association’s request, prepare a report on the incident or accident and propose any measures to prevent its recurrence. Report all other incidents to the Association in quarterly reports.	Notify the Association within 48 hours of learning of an incident or accident. On timeframe communicated by the Association.	Responsibility: PIU Risk Management Team Accountability: Head of PIU Funding: Project Funds
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			

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<p>1.1</p>	<p>ORGANIZATIONAL STRUCTURE: A Project implementation unit (PIU) has been set up at MoLSA, including at least one Social Specialist, which shall be maintained through Project implementation to manage the environmental and social risks of the Project and ensure compliance with this ESCP.</p> <p>MoLSA shall update the service contracts with WFP for the parent project in a manner acceptable to the Association to support the implementation of the project.</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 the Social Risk Management team with a Grievance Redress Mechanism (GRM)/Social Risk Management (SRM) Specialist and a Labor GRM Specialist hired.</p> <p>Maintain throughout Project implementation.</p>	<p>Risk Management Team Accountability: Head of PIU Funding: Project Funds</p>
<p>1.2</p>	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENT Scoping of key environmental and social risks and impacts of the Project and identify appropriate mitigation measures shall be conducted in accordance with the Social Management Plan (SMP) described in 1.3. A rapid social assessment will be conducted during implementation and the SMP be updated accordingly</p>	<p>Social assessment conducted for the parent project.</p> <p>A rapid social assessment to cover the new geographical scope will be conducted within three months of effectiveness and the SMP be updated accordingly.</p>	<p>Risk Management Team Accountability: Head of PIU Funding: Project Funds</p>

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<i>Material Measures and Actions</i>			
1.3	<p>MANAGEMENT TOOLS AND INSTRUMENTS Screen any proposed subproject for E&S risks and impacts and thereafter, draft, adopt, and implement a Social Management Plan (SMP), as required, in a manner acceptable to the Bank/Association.</p>	<p>Social Management Plan to be updated within three months of Project Effectiveness. AF activities be conducted in accordance with the Parent SMP pending an update, Maintained throughout Project implementation</p>	<p>Responsibility: PIU Risk Management Team Accountability: Head of PIU Funding: Project Funds</p>
1.4	<p>MANAGEMENT TOOLS AND INSTRUMENTS: Update the Social Management Plan (SMP) for the parent project to ensure adequate assessment and management of Project social risks and impacts in accordance with the ESSs, including measures for the proper management of cash transfers, measures to prevent and respond to gender-based violence, security risks, and a clear delineation of the roles and responsibilities of MoLSA, WFP and other entities involved in Project implementation.</p> <p>Update Review and update the SMP annually, or more frequently if required, throughout Project implementation.</p>	<p>Social Management Plan to be updated within three months of Project Effectiveness. AF activities be conducted in accordance with the Parent SMP pending an update.</p>	<p>Responsibility: PIU Risk Management Team Accountability: Head of PIU Funding: Project Funds</p>

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1.5	PARTNERSHIP WITH WFP: Update the service contract with WFP to ensure that it incorporates all the relevant aspects of this ESCP and ensure the implementing partners, including partners engaged directly by WFP, are required to carry out the Project in accordance with the Environmental and Social Standards and this ESCP. These contracts shall be monitored and enforced by MoLSA, as necessary.	Service Level Agreements between MoLSA and WFP shall be updated for the activities under the Additional Financing prior to disbursement of cash transfers. Maintain the service contracts throughout Project implementation	Responsibility: PIU Risk Management Team Accountability: Head of PIU Funding: Project Funds
1.6	THIRD PARTY MONITORING: Hire and maintain an Independent Third Party Monitoring Agent (TPM) to provide independent review of environmental and social performance of the Project and sub-projects, including adherence to all aspects of the Project Operations Manual.	The contract of the TPM agency for the parent project shall be extended to include monitoring of Project activities and to ensure continuation in monitoring of activities.	Responsibility: PIU Risk Management Team Accountability: Head of PIU Funding: Project Funds
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	LABOR MANAGEMENT PROCEDURES Develop, adopt, and implement Labor Management Procedures (LMP). LMP for the parent project shall be updated to account for the additional scope under the AF.	LMPs for the parent project to be updated within three months of Project Effectiveness. AF activities be conducted in accordance with the Parent LMP pending an update.	Responsibility: PIU Risk Management Team Accountability: Head of PIU Funding: Project Funds
2.2	GRIEVANCE MECHANISM FOR PROJECT WORKERS Develop and maintain a grievance redress mechanism (GRM) for project workers, including contracted and community workers, as part of the LMP.	GRM for the parent project is operational and shall service grievances related to the Project as well.	Responsibility: PIU Risk Management Team Accountability: Head of PIU Funding: Project Funds

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<i>Material Measures and Actions</i>			
2.3	OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES Develop and implement occupational, health and safety (OHS) measures, based on World Bank EHS Guidelines, as part of the SMP and LMP.	LMP and SMP operational. To be updated within three months of effectiveness	Responsibility: PIU Risk Management Team Accountability: Head of PIU Funding: Project Funds
2.4	PROJECT WORKERS TRAINING: Train Project workers to heighten awareness of risks and to mitigate impacts on local communities, as defined in SMP, LMP and GBV Action Plan in 4.1.	On timeframes specified in the SMP, LMP, and GBV Action Plan.	Responsibility: PIU Risk Management Team Accountability: Head of PIU Funding: Project Funds
2.5	SECURITY OF PROJECT WORKERS AND PROJECT-AFFECTED PARTIES: Adopt and implement prevention measures and emergency responses for different categories of Project workers and Project-affected parties. These measures shall be consistent with ESS2 and ESS4 and contained in a standalone Security Management Plan (SeMP).	LMP. SMP for the parent project shall be updated within three months of Project Effectiveness. AF activities be conducted in accordance with the Parent SMP pending an update.	Responsibility: PIU Risk Management Team Accountability: Head of PIU Funding: Project Funds
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	E-WASTE MANAGEMENT PLAN: Ensure that any e-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.	Project Operations Manual already in place.	Responsibility: PIU Risk Management Team Accountability: Head of PIU Funding: Project Funds
ESS 4: COMMUNITY HEALTH AND SAFETY			

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4.1	<p>COMMUNITY HEALTH AND SAFETY: Measures and actions to assess and manage specific risks and impacts in accordance with ESS4 shall be included in the SMP.</p>	<p>Social Management Plan be updated on timeframe in 1.3.</p>	<p>Responsibility: PIU Risk Management Team Accountability: Head of PIU Funding: Project Funds</p>
4.2	<p>GBV AND SEA RISKS: Develop and implement measures and actions to assess and manage the risks of gender-based violence (GBV), including, inter alia, risks related to the receipt of cash transfers by women and children (particularly at payment points) and sexual exploitation and abuse (SEA) linked to registration or release of funds. These measures shall be included in a GBV Action Plan to be included as part of the SMP to be developed under actions 1.2 and 1.3. The GBV Action Plan shall also include provisions related to reporting and response, including procedures for reporting through GBV-sensitive GRM systems and codes of conduct, outlining expectations for behavior and sanctions for breach for all contractors hired under the Project, including partners making payments and their hired security actors.</p>	<p>GBV Action Plan to be included in Social Management Plan update on timeframe in 1.3.</p>	<p>Responsibility: PIU Risk Management Team Accountability: Head of PIU Funding: Project Funds</p>
4.3	<p>SECURITY PERSONNEL: Adopt and implement WFP mechanisms under the parent project to assess the risks and manage security personnel, including adoption of codes of conduct, training on humanitarian protection, GBV and SEA. These mechanisms are described in the Social Management Plan already developed. The LMP includes provision for a Code of Conduct governing all security personnel hired for the Project.</p>	<p>Social Management Plan operational. To be updated within three months of effectiveness</p>	<p>Responsibility: PIU Risk Management Team Accountability: Head of PIU Funding: Project Funds</p>
4.4	<p>TRAINING FOR THE COMMUNITY: WFP systems shall include mechanisms for community engagement and training as required for the Project.</p>	<p>Training and awareness creation conducted. This will be maintained throughout the life of the AF. Maintained throughout Project implementation as required</p>	<p>Responsibility: PIU Risk Management Team Accountability: Head of PIU Funding: Project Funds</p>

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

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This standard is not relevant for the Project.			
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	This standard is not relevant for the Project.		
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	This standard is not relevant for the Project.		
ESS 8: CULTURAL HERITAGE			
8.1	This standard is not relevant for the Project.		
ESS 9: FINANCIAL INTERMEDIARIES			
9.1	This standard is not relevant for the Project.		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION Prepare, disclose and implement SEP. The SEP shall be amended, updated and redisclosed as needed during Project implementation to the satisfaction of the Association.	SEP already prepared for the activities under the AF. To be updated after community consultations in the new area of AF coverage within three months of project effectiveness	Responsibility: PIU Risk Management Team Accountability: Head of PIU Funding: Project Funds
10.2	PROJECT GRIEVANCE MECHANISM: Establish, maintain and operate a grievance mechanism (GM) to ensure reception and timely response to any complaints made about the Project (including those from members of the communities, and other stakeholders), as described in the SEP, in accordance with ESS10 and in a manner satisfactory to the Association.	Grievance Mechanism for the parent project shall service grievances for the Project.	Responsibility: PIU Risk Management Team Accountability: Head of PIU Funding: Project Funds
CAPACITY SUPPORT (TRAINING)			

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<p>CS1</p>	<p>The following training have been conducted and shall continue under the Project as required.</p> <p>PIUs:</p> <ul style="list-style-type: none"> • Environmental and Social Awareness training in the ESF • E&S focal points will require training on their obligations under the SMP and reporting. <p>Implementing partners contracted to WFP:</p> <ul style="list-style-type: none"> • Stakeholder mapping and engagement • Obligations under the Social Management Plan • Obligations for reporting incidents to the client • Labor management procedures • Gender Based Violence awareness and accountability training • Emergency preparedness and response 	<p>Training and awareness creation to continue throughout Project implementation, as required.</p>	<p>Responsibility: PIU Risk Management Team Accountability: Head of PIU Funding: Project Funds</p>
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