

FEDERAL GOVERNMENT OF SOMALIA



Ministry of Finance (MoF)

Somalia Crisis Recovery Project (SCRP)

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

March 2020

Somalia Crisis Recovery Project (SCRP)

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. *The Ministry of Finance of the Federal Republic of Somalia (hereinafter the Ministry of Finance) is planning to implement the **Somalia Crisis Recovery Project (SCRP (the Project))**, with the possible involvement of the following agencies as service providers/implementing partners: United Nations Office for Project Services (UNOPS), Food and Agricultural Organization (FAO), Somalia Resilience Programme (SomRep), Building Resilient Communities in Somalia (BRiCS). The International Development Association (hereinafter the Bank or the World Bank) has agreed to provide financing for the Project.*
2. *The Ministry of Finance 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. *Where the ESCP refers to specific plans or other documents, whether they have already been prepared or are to be developed, the ESCP requires compliance with all provisions of such plans or other documents. In particular, the ESCP requires compliance with the provisions set out in the Environmental and Social Management Framework (ESMF) and Pest Management Plan (PMP) that will 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 Ministry of Finance of the Federal Republic of Somalia 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 Bank by the Ministry of Finance 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 Ministry of Finance, 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 Ministry of Finance 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 Ministry of Finance. The Ministry of Finance will promptly disclose the updated ESCP. Depending on the project, the ESCP may also specify the funding necessary for completion of a measure or action.*
7. *Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, the Ministry of Finance 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, and gender-based violence.*

Somalia Crisis Recovery Project (SCRP)
ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN
DATE 27 March 2020

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ESCP Monitoring and Reporting

	<p>REGULAR REPORTING: Prepare and submit regular monitoring reports on the implementation of the ESCP.</p>	<p>Quarterly reporting throughout Project implementation to the World Bank.</p> <p>Service Providers/technical leads report to Project Implementation Unit (PIU) (integrated into the MoF) on a monthly basis.</p>	<p>Responsibility: PIU Risk Management Team</p> <p>Accountability: Head of PIU</p> <p>Funding: Project Funds</p>	<p>Quarterly throughout the Project implementation</p>
	<p>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.</p> <p>Following the World Bank classification of incidents</p>	<p>Report severe incidents to the World Bank within 48 hours after an incident or accident has occurred in line with FGS procedures and the World Bank's Environment and Social Incidence Response Toolkit (ESIRT) to the World Bank, after taking notice of the incident or accident.</p> <p>Report all other incidents to the World</p>	<p>Responsibility: PIU Risk Management Team</p> <p>Accountability: Head of PIU</p> <p>Funding: Project Funds</p>	<p>Throughout the Project implementation</p>

Somalia Crisis Recovery Project (SCRP)
ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN
DATE 27 March 2020

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	Bank in quarterly reports.		

SUMMARY ASSESSMENT

ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS

1.1	<p>ORGANIZATIONAL STRUCTURE: Appoint an experienced Environmental Specialist and Social Specialist, each with more than eight (8) years of experience in carrying out environmental and social assessments of infrastructure projects to be full time dedicated to the project.</p> <p>Mobilize additional staff needed 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), pest management systems, and social inclusion.</p>	<p>Prior to disbursement for activities under component 1,2 &3</p> <p>Prior to disbursement for activities under component 1&2</p> <p>Maintain throughout project implementation.</p>	<p>Accountability: Head of PIU</p> <p>Funding: Project Funds</p>	<p>Environmental Specialist and Social Specialist to be retained until the Project is completed</p>
1.2	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENT: Scoping of key environmental and social risks and impacts of the Project and identify appropriate mitigation measures to be included in the Environmental and Social Management Framework (ESMF) described in 1.3.</p> <p>Undertake site-specific environmental and social risk screening and impact assessments for sub-projects including assessment of surveillance, diagnostics and treatment activities,</p>	<p>Prior to disbursement for activities under component 1,2 &3</p> <p>Prior to commencement of sub-projects</p>	<p>Responsibility: PIU Risk Management Team</p> <p>Funding: Project Funds</p>	<p>As part of ESMF revisions and ongoing throughout Project assessing the impacts according to ESMF procedures</p>

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ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN
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<p>1.3 MANAGEMENT TOOLS AND INSTRUMENTS: Prepare, consult on and disclose an Environmental and Social Framework (ESMF) which establishes the criteria and procedures for screening sub-project investments and guide the preparation of site-specific Environmental and Social Management Plans (ESMPs) or Environmental and Social Impact Assessments (ESIAs) for higher risk projects (based on ESMF screening criteria), preparation of site-specific ESIAs/ESMPs, including management and monitoring of mitigation measures, and Contingent Emergency response component (CERC) ESMF, 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>Prepare site-specific ESIAs/ESMPs in line with the screening and assessment guidelines provided in in the ESMF described in 1.3.</p> <p>Develop adopt and disclose Pest Management Plan satisfactory to the World Bank. Screening of pesticides to be financed through retroactive financing. Only biopesticide will be procured for retroactive financing, in line with ESS3 and FAO's guidelines for procuring and managing pesticides shall be used, whichever is the most stringent.</p>	<p>ESMF for component 1, 2 and 3 activities Prior to disbursement and a separate CERC ESMF on activation of CERC co</p> <p>SEP already prepared. To be updated after community consultations and prior to disbursements.</p> <p>Prior to commencement of civil works/related project activities</p> <p>PMP to be prepared and disclosed prior to disbursement of Component 1 and retroactive financing</p> <p>Prior to retroactive financing</p>	<p>Responsibility: PIU Risk Management Team</p> <p>Funding: Project Funds</p>	<p>Implemented throughout Project implementation</p>

Somalia Crisis Recovery Project (SCRP)
ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN
DATE 27 March 2020

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	<i>A TOR for dam safety assessment and flood control management study to include dam safety assessment</i>	Prior to flood control management study		
1.4	<p>MANAGEMENT OF CONTRACTORS: <i>Develop and implement procedures for managing contractors and subcontractors by the following:</i></p> <ul style="list-style-type: none"> • <i>environmental and social requirements will be included in the procurement and contracting process including bidding documents, for potential civil works.</i> • <i>relevant requirements are included in contracts and subcontracts consistent with the requirements of ESSs;</i> • <i>codes of conduct are required for contractors and subcontractors and their workers;</i> • <i>preparation of a detailed construction-ESMP (C-ESMP) that is costed, with sufficient budget to mitigate E&S risks</i> • <i>monitor contractor commitment and compliance with ESSs</i> • <i>providing grievance redress mechanisms for contractor and subcontractor, communities and other stakeholders</i> • <i>ensure contractors provide details on contractor's oversight on environmental, social, health and safety (ESHS) performance</i> • <i>contractor to develop a grievance mechanism to handle concerns of their employees</i> • <i>contractor shall prepare a Labor Management Plan (LMP)</i> 	<p><i>Prior to the preparation of procurement documents.</i></p> <p><i>Maintain procedures throughout Project implementation</i></p>	<p><i>Responsibility: PIU Risk Management Team</i></p> <p><i>Accountability: Head of PIU</i></p> <p><i>Funding: Project Funds</i></p>	<i>Ongoing throughout Project implementation</i>

Somalia Crisis Recovery Project (SCRP)
ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN
DATE 27 March 2020

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1.5	<p>PERMIT, CONSENTS AND AUTHORIZATIONS: Obtain or assist in obtaining, as appropriate, the permits, consents and authorizations that are applicable to the Project from relevant national authorities.</p> <p>Comply or cause to comply, as appropriate, with the conditions established in these permits, consents and authorizations throughout Project implementation.</p>	<p>Prior to initiating activities that require permits, consents and authorizations.</p> <p>Prior to procurement of contractors.</p>	<p>Responsibility: PIU Risk Management Team</p> <p>Accountability: Head of PIU</p> <p>Funding: Project Funds</p>	Ongoing throughout Project implementation
1.6	<p>THIRD PARTY MONITORING:</p> <p>An Independent Verification Agent (IVA) will be engaged to provide independent review of environmental and social performance of the sub-projects, including adherence to all aspects of the Project Operations Manual.</p>	<p>Prior to commencement of Project activities</p>	<p>Responsibility: PIU Risk Management Team</p> <p>Accountability: Head of PIU</p> <p>Funding: Project Funds</p>	Throughout Project implementation
ESS 2: LABOR AND WORKING CONDITIONS				
2.1	<p>LABOR MANAGEMENT PROCEDURES:</p> <p>Develop Labor Management Procedures (LMP) as part of the ESMF. The</p>	<p>Prior to disbursement for activities under component 1,2,3 &4</p>	<p>Responsibility: PIU Risk Management Team</p> <p>Accountability: Head of PIU</p> <p>Funding: Project Funds</p>	Implement throughout Project implementation
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS:</p> <p>Develop and maintain a grievance redress mechanism (GRM) for direct project workers, including contracted and community workers as part of the LMP</p>	<p>GRM operational prior to engaging project workers.</p>	<p>Responsibility: PIU Risk Management Team</p> <p>Accountability: Head of PIU</p> <p>Funding: Project Funds</p>	Maintained throughout Project implementation

Somalia Crisis Recovery Project (SCRIP)
ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN
DATE 27 March 2020

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2.3	<p>OHS MEASURES: <i>Develop and implement occupational, health and safety (OHS) measures, based on World Bank EHS Guidelines, as part of the ESMF including through, inter alia, implementing adequate occupational health and safety measures and incorporating labor requirements into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms.</i></p>	<p><i>Prior to disbursement for activities under component 1,2 &3</i></p> <p><i>Maintained throughout Project implementation</i></p>	<p><i>Responsibility: PIU Risk Management Team</i></p> <p><i>Accountability: Head of PIU</i></p> <p><i>Funding: Project Funds</i></p>	<p><i>Maintained throughout Project implementation.</i></p>
2.4	<p>EMERGENCY PREPAREDNESS AND RESPONSE: <i>As part of the OHS measures specified in 2.3, include measures on Emergency Preparedness and Response, and ensure coordination with measures under 4.5. Ensure workers and contractors are trained and implement the plan.</i></p>	<p><i>Prior to disbursement for activities under component 1&2</i></p> <p><i>Maintained throughout Project implementation</i></p>	<p><i>Responsibility: PIU Risk Management Team</i></p> <p><i>Accountability: Head of PIU</i></p> <p><i>Funding: Project Funds</i></p>	<p><i>Maintained throughout Project implementation</i></p>
2.5	<p>PROJECT WORKERS TRAINING: <i>Implement training of project workers designed to heighten awareness of risks and to mitigate impacts on local communities, as defined in ESMF, LMP and GBV action plan.</i></p>	<p><i>Prior to initiating construction, with regular refresher training.</i></p> <p><i>Maintained throughout Project implementation</i></p>	<p><i>Responsibility: PIU Risk Management Team</i></p> <p><i>Accountability: Head of PIU</i></p> <p><i>Funding: Project Funds</i></p>	<p><i>Maintained throughout Project implementation</i></p>

Somalia Crisis Recovery Project (SCRP)
ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN
DATE 27 March 2020

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2.6.	SECURITY OF PROJECT WORKERS AND PROJECT-AFFECTED PARTIES: Prevention measures and emergency responses for different categories of project workers and project-affected parties will be developed in a Security Management Plan (SMP)	Prior to disbursement for activities under component 1,2,3 Maintained throughout Project implementation	Responsibility: PIU Risk Management Team Accountability: Head of PIU Funding: Project Funds	Maintained throughout Project implementation			
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT							
3.1	MANAGEMENT OF WASTE AND HAZARDOUS MATERIALS: As part of ESMF develop and implement measures and procedures for managing health/medical waste management. As part of the PMP, develop and implement measures and procedures for managing waste and hazardous materials during construction and disposal and locust spraying activities. Contractors will prepare a waste management plan as part of the CESMP.	Prior to initiating construction Maintained throughout Project implementation	Responsibility: PIU Risk Management Team Accountability: Head of PIU Funding: Project Funds	Maintained throughout Project implementation			
3.2.	RESOURCE EFFICIENCY As part of the ESMF, develop and implement measures and procedures for managing natural resources to avoid impacts on community shared resources and/or adverse environmental impacts. Contractors will prepare respective measures as part of the (C)ESMP. Measures to minimize and/or avoid pollution will equally be integrated.	Prior to initiating construction. Maintained throughout Project implementation	Responsibility: PIU Risk Management Team Accountability: Head of PIU Funding: Project Funds	Maintained throughout Project implementation			
ESS 4: COMMUNITY HEALTH AND SAFETY							
4.1	TRAFFIC AND ROAD SAFETY: In consultation with the host communities, develop and implement road safety management measures as part of the ESMF. Contractors will	General approach will be outlined in the ESMF, site-specific plans prior	Responsibility: PIU Risk Management Team	Maintained throughout Project implementation			

Somalia Crisis Recovery Project (SCRP)
ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN
DATE 27 March 2020

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	<i>develop road safety management plan as part of the CESMP to address the impacts on local communities of moving construction equipment.</i>	<i>to initiating construction. Maintained throughout Project implementation</i>	<i>Accountability: Head of PIU Funding: Project Funds</i>	
4.2	COMMUNITY HEALTH AND SAFETY: Measures and actions to assess and manage specific risks and impacts outlined in the PMP, ESMF and subsequent ESMPs including, inter alia, measures to: minimize the potential for community exposure to communicable diseases <i>Contractors will prepare a Health and Safety Plan as part of the CESMP.</i>	<i>Prior to initiating construction Maintained throughout Project implementation</i>	<i>Responsibility: PIU Risk Management Team Accountability: Head of PIU Funding: Project Funds</i>	<i>Maintained throughout Project implementation</i>
4.3	GBV AND SEA RISKS: Undertake gap assessment of GBV/SEA/Child Protection risks and identify mitigation measures and actions and develop and implement a GBV/SEA/Child Protection Action Plan.	<i>Prior to disbursement for activities under component 1&2</i>	<i>Responsibility: PIU Risk Management Team Accountability: Head of PIU Funding: Project Funds</i>	<i>Maintained throughout Project implementation</i>
4.4	GBV AND SEA RISKS DURING PROJECT IMPLEMENTATION: There will be GBV procedures in place, including training and monitoring, pre-deployment and during project implementation. This will be defined in the ESMF and through a GBV/SEA/Child Protection Action Plan	<i>Prior to initiating construction and maintained throughout Project implementation</i>	<i>Responsibility: PIU Risk Management Team Accountability: Head of PIU Funding: Project Funds</i>	<i>Maintained throughout Project implementation</i>
4.5	EMERGENCY RESPONSE MEASURES: Measures will be defined in the ESMF and subsequent ESMPs and included as part of the SEP	<i>Prior to initiating construction</i>	<i>Responsibility: PIU Risk Management Team</i>	<i>Maintained throughout Project implementation</i>

Somalia Crisis Recovery Project (SCRIP)
ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN
DATE 27 March 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>
		<i>Maintained throughout Project implementation</i>	<i>Accountability: Head of PIU</i> <i>Funding: Project Funds</i>	
4.6	<p>SECURITY PERSONNEL: Possible deployment of security personnel (Cash for Work), procedures will be outlined in the ESMF in particular the LMP</p> <p><i>In the event that security personnel is used for the sub-projects, the contractor shall develop and implement measures and actions to assess and manage the risks to human security of project-affected communities and project workers that could arise from the use of security personnel.</i></p>	<p><i>Prior to initiating construction</i></p> <p><i>Maintained throughout Project implementation</i></p>	<p><i>Responsibility: PIU Risk Management Team</i></p> <p><i>Accountability: Head of PIU</i></p> <p><i>Funding: Project Funds</i></p>	<i>Maintained throughout Project implementation</i>
4.7	<p>TRAINING FOR THE COMMUNITY: Outlined in SEP and PMP</p> <ul style="list-style-type: none"> • <i>IPs shall conduct trainings for the community designed to heighten awareness of environmental and social risks and impacts and mitigation measures including trainings on (not exhaustive):</i> • <i>Communicable diseases/HIV-AIDS/STI/GBV awareness and prevention</i> • <i>Community grievance redress mechanism as described in the SEP/ ESMF</i> • <i>Road Safety Awareness</i> 	<i>Prior to initiating construction, with regular refresher training.</i>	<p><i>Responsibility: PIU Risk Management Team</i></p> <p><i>Accountability: Head of PIU</i></p> <p><i>Funding: Project Funds</i></p>	<i>Maintained throughout Project implementation</i>

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

Somalia Crisis Recovery Project (SCRP)
ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN
DATE 27 March 2020

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5.1	<p>LAND ACQUISITION AND RESETTLEMENT: <u>Prepare, consult on and disclose</u> a Resettlement Planning Framework (PPF) for component 1, 2 and 3</p> <p>When project sites are identified Prepare a Resettlement Action Plans (RAP) or Abbreviated Resettlement Action Plan (ARAP) as appropriate and in compliance with ESS 5 before work begins on each site .</p>	<p>prior to disbursement for activities under these components 1 2 and 3</p> <p>Before start of activities and release of funds</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>	Maintained throughout Project implementation
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES				
6.1	<p>BIODIVERSITY RISKS AND IMPACTS:</p> <p>As part of the ESMF and PMP, develop and implement screening procedures for biodiversity risks and impacts likely to occur from implementing project activities. A list of limitation on different types of interventions will be included in the ESMF and PMP</p>	<p>Prior to disbursement for activities under component 1,2&3</p>	<p>Responsibility: PIU Risk Management Team/FAO</p> <p>Accountability: Head of PIU/FAO</p>	Maintained throughout Project implementation.
6.2	<p>Only biopesticides will be procured for retroactive financing. FAO's guidelines for procuring and using pesticides and ESS3 shall be used, whichever is most stringent.</p>	<p>Prior to disbursement for activities under component 1</p>	<p>Funding: Project Funds</p>	
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES				
7.1	This standard is not relevant, as there are no persons that meet the identification criteria for IP/SSAHUTLCs			
ESS 8: CULTURAL HERITAGE				

Somalia Crisis Recovery Project (SCRP)
ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN
DATE 27 March 2020

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8.1	CULTURAL HERITAGE AND CHANCE FINDS: Develop and implement Chance Find Procedures as part of the ESMF.	Prior to and maintained throughout construction.	Responsibility: PIU Risk Management Team Accountability: Head of PIU Funding: Project Funds	Maintained throughout Project implementation.

ESS 9: FINANCIAL INTERMEDIARIES

This standard is not relevant, as the project has no financial intermediaries

ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE

Somalia Crisis Recovery Project (SCRP)
ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN
DATE 27 March 2020

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10.1	SEP PREPARATION: Prepare, disclose, adopt, and implement a Stakeholder Engagement Plan (SEP) consistent with ESS10, in a manner acceptable to the Bank, which shall include, inter alia, measures to generate community trust and engagement in the carrying out of the Project activities..	SEP already prepared. To be updated after community consultations and prior to disbursements for activities under component 1,2 &3 To be updated regularly throughout Project implementation	Responsibility: PIU Risk Management Team Accountability: Head of PIU Funding: Project Funds	Throughout project implementation
10.2	SEP IMPLEMENTATION: Implement the SEP.	As of March, 2020	Responsibility: PIU Risk Management Team Accountability: Head of PIU Funding: Project Funds	Throughout project implementation
10.3	PROJECT GRIEVANCE MECHANISM: Develop the Project Grievance Redress Mechanism, as part of the SEP 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 Bank.	Prior to effectiveness Throughout Project implementation	Responsibility: PIU Risk Management Team Accountability: Head of PIU Funding: Project Funds	Throughout Project implementation
10.4				
Capacity Support				
Specify Training to be provided		Specify Targeted Groups and Timeframe for	Specify Training Completed	

Somalia Crisis Recovery Project (SCRP)
ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN
DATE 27 March 2020

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<p>All capacity building activities and trainings will be further detailed in the ESMF, trainings may be required in:</p> <ul style="list-style-type: none"> • Stakeholder engagement • Subprojects Environmental and Social screening • World Bank ESS • Occupational and Community Health and Safety • Emergency preparedness and response • Gender-Based Violence Risk Mitigation • Grievance Management • Implementation, Monitoring and reporting of ESMPs • Labor management procedures • Security Management 	<p><i>Delivery</i></p> <p>PIU, IPs, project workers, community workers</p>		