

FEDERAL GOVERNMENT OF SOMALIA



Ministry of Labor & Social Affairs

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

ENVIRONMENTAL and SOCIAL COMMITMENT PLAN (ESCP)

June 30, 2019

FEDERAL GOVERNMENT OF SOMALIA
Ministry of Labor & Social Affairs

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Federal Government of Somalia is planning to implement the Somalia Shock-Responsive Safety Net for Human Capital Project (the Project), with the involvement of the Ministry of Labor & Social Affairs (MoLSA), the Ministry of Finance, the Ministry of Planning and Economic Development, Ministry of Humanitarian Affairs and Disaster Management, Ministry of Education, Ministry of Health and Ministry of Agriculture and regional governments, through a steering committee to ensure effective consultation and collaboration. MoLSA will also sign service contracts with the World Food Program (WFP) and the United Nations Children's Fund (UNICEF) who will support the implementation of the Project. The International Development Association (hereinafter the Association) has agreed to provide financing for the Project.
2. The Federal Government of Somalia 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 developed for this Project, and the Social Management Plan and Labor Management Procedures to be developed for the Project.
4. The table below summarizes the material measures and actions that are required as well as their timing. 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 referenced in 1 above, regional governments or by contractors.
5. Implementation of the material measures and actions set out in this ESCP will 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 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 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 Federal Government of Somalia, through MoLSA, shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts.

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<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>
ESCP 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) I reports submitted to the Association throughout Project implementation. Mid-term and completion reports will also be required at times determined during project implementation.	MoLSA The cost of monitoring and reporting will be incorporated the overall Project management costs	Throughout Project implementation
B	INCIDENTS AND ACCIDENTS NOTIFICATION: Promptly notify within 24 hours any incident or accident related to the Project or that has an impact on it, and that has or could have a significant adverse effect on the environment, the affected communities, the public, or the workers included, for example, accidents that could result in death or serious injury, cases of gender based violence or violence against minors, injuries, falls, vehicle accidents and electrocution. Provide sufficient details regarding the incident or accident, and indicate immediate measures taken to address it and include any information provided by any contractor or supervising engineer.	Any incident or accident shall be notified to the Association within 24 hours after taking note of the incident or accident.	MoLSA, UNICEF, WFP Funding from Project Budget	Throughout Project implementation
SUMMARY ASSESSMENT				
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS				
1.1	ORGANIZATIONAL STRUCTURE: A Project implementation unit (PIU) will be set up at MoLSA,	PIU, including a qualified Social Specialist, established one (1)	MoLSA, UNICEF,	Within the specified timeframe and

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	including at least one Social Specialist, and thereafter maintained throughout Project implementation. MoLSA will sign service contracts acceptable to the Association with WFP and UNICEF to support the implementation of Parts 1 and 2 respectively. Both UNICEF and WFP will be required to employ qualified social specialists with experience managing and reporting on E&S risks.	week after the Effective Date, and thereafter maintained throughout Project implementation.	WFP Funding from Project budget.	throughout Project implementation.
1.2	SOCIAL MANAGEMENT PLAN: Develop and implement a Social Management Plan (SMP) to assess and manage the social risks for the Project, which will include, inter alia, 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 UNICEF, and other entities involved in Project implementation. MoLSA, WFP and UNICEF will be required to review and update the SMP annually (or as otherwise required) throughout Project implementation.	The preparation of a SMP, acceptable to the Association prepared, is a condition of disbursement of Component 1 under the legal agreement. Annual review and update of the SMP or as required by significant changes in operating conditions.	MoLSA WFP UNICEF The cost of implementing the SMP will be incorporated the overall Project management costs.	Within the specified timeframe and maintained throughout Project implementation
1.3	PARTNERSHIP WITH WFP AND UNICEF: The service contracts with WFP and UNICEF will incorporate all the relevant aspects of this ESCP, to ensure the implementing partners, including partners engaged directly by WFP and UNICEF (e.g. Standard Chartered Bank (Amal Bank), local NGOs) are committed to carry out the Project in accordance with the	Development of procedures: to be completed by date of signing service contracts.	MoLSA, UNICEF, WFP SMP will include a budget for	

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	Environmental and Social Standards. These contracts will be monitored and enforced by MoLSA, as appropriate. WFP and UNICEF will make use of the United Nations security apparatus and existing systems for managing cash transfers and capacity building in Somalia to manage their operations under this Project, which will be described, as appropriate, in the SMP to be developed under action 1.2 above.	Maintain the service contracts throughout Project implementation	implementation	
1.4	PERMIT, CONSENTS AND AUTHORIZATIONS: 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.	All relevant permits, consents and authorizations: before commencement of related Project activities.	MoLSA, UNICEF, WFP	Securing permits as indicated and compliance with the permits throughout Project implementation.
1.5	THIRD PARTY MONITORING: Third parties will be engaged by MoLSA and complemented by field-based community monitors to support Project monitoring.	Prior to the first reporting period.	MoLSA	Prior to the first reporting period to be maintained throughout Project implementation.
ESS 2: LABOR AND WORKING CONDITIONS				
2.1	LABOR MANAGEMENT PROCEDURES: Develop and implement written Labor Management Procedures (LMP).	LMP, acceptable to the Association, to be prepared prior to disbursement of cash transfers under comp. 1. LMP thereafter implemented throughout Project implementation.	MoLSA UNICEF WFP	Within the specified timeframe and maintained throughout Project implementation

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2.2	GRIEVANCE MECHANISM: The Project will establish and operate a grievance mechanism for workers as described in the LMP.	Grievance mechanism for workers maintained throughout Project implementation.	MoLSA UNICEF WFP	Throughout Project implementation.
2.3	OHS MEASURES: Prepare and implement appropriate occupational health and safety measures (OHS), including any emergency preparedness and response measures necessary, in accordance with the guidelines contained in the Labor Management Procedures. As the Project is adopting WFP and UNICEF systems and procedures for Parts 1 and 2 respectively, the LMP will reference any existing and applicable occupational health and safety (OHS) measures of these institutions as well.	Same timeframe as action 2.1	MoLSA UNICEF WFP	Same as action 2.1.
2.4	PROJECT WORKERS TRAINING: Project workers will receive training on humanitarian protection policies on discriminated and marginalized groups, gender-based violence, operational health and safety, emergency response procedures and personal security. Training for Project workers and contractors will be determined and overseen by the implementing agencies. On Part 1, NGOs will receive training on the use of Food Security Cluster guidelines for community consultations.	LMP to include training plan. Training conducted throughout Project implementation.	MoLSA UNICEF WFP	<i>Throughout Project implementation.</i>
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT				

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3.1	MANAGEMENT OF WASTE AND HAZARDOUS MATERIALS: Ensure that any e-waste generated by the Project is segregated from other forms of waste and is taken to licensed refurbishers, collection centers or recyclers. Where applicable, procurement procedures will integrate the degree of potential for refurbishment into the selection process for procurement of computers. Details to guide this will be included in the Project Operations Manual.	September 1, 2019	MoLSA UNICEF WFP	Within the specified timeframe and throughout Project implementation
ESS 4: COMMUNITY HEALTH AND SAFETY				
4.1	GBV AND SEA RISKS: Develop and implement measures and actions to assess and manage the risks of gender-based violence (GBV), including, inter alia, around the receipt of cash transfers by women and children (particularly at payment points) and sexual exploitation and abuse (SEA) risks linked to registration or release of funds. These measures will be documented in a GBV action plan to be included as part of the SMP to be developed under action 1.2. The plan will 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.	SMP to include GBV Action plan prior to disbursement of cash transfers under component 1. GBV Action Plan implemented throughout Project implementation.	MoLSA UNICEF WFP	Within the specified timeframe and throughout Project implementation
4.3	SECURITY PERSONNEL. WFP and UNICEF have existing mechanisms to assess the risks and manage security personnel, including adoption of codes of	Throughout Project implementation.	MoLSA WFP UNICEF	Throughout Project implementation.

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	conduct, training on humanitarian protection, GBV and SEA. These mechanisms will be described in the Social Management Plan to be developed under action 1.2 above Under Component 1, implementing partners (Standard Bank subsidiary Amal Bank and locally recruited NGOs) will be responsible for their own security. The LMP will include provision for a Code of Conduct governing all security personnel hired to protect this Project.	Timeframe for preparation of the LMP indicated in action 2.1 above.	Standard Chartered Bank (Amal Bank) Local NGOs	
4.4	TRAINING FOR THE COMMUNITY: Under Part 1, WFP systems include mechanisms for community engagement and training as required for the Project to be undertaken by local NGOs hired for the purpose.	Throughout Project implementation.	MoLSA WFP	Throughout Project implementation.
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT				
	This standard is not relevant for the Project.			
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES				
	This standard is not relevant for the Project.			
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES				
	This standard is not relevant for the Project.			
ESS 8: CULTURAL HERITAGE				
	This standard is not relevant for the Project.			
ESS 9: FINANCIAL INTERMEDIARIES				
	This standard is not relevant for the Project.			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE				
10.1	STAKEHOLDER ENGAGEMENT PLAN (SEP) PREPARATION AND	SEP already prepared.	MoLSA,	

	<p>IMPLEMENTATION: Develop and implement a Stakeholder Engagement Plan (SEP), in a manner acceptable to the Association, to ensure engagement with the Project-affected communities and other stakeholders throughout Project implementation.</p> <p>The SEP will be amended, updated and redisclosed as needed during Project implementation.</p>	<p>Community consultations will be undertaken prior to disbursement of cash transfers under component 1 and will continue through implementation.</p> <p>The SEP will be updated once the SMP is completed to reflect any additional requirements, and will be implemented throughout Project implementation.</p>	UNICEF, WFP	Within the specified timeframe and maintained throughout Project implementation
10.2	<p>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.</p>	GM to be established prior to commencement of Project activities and will be maintained and operated throughout Project implementation.	MoLSA UNICEF WFP	Within the specified timeframe and throughout Project implementation.
Capacity Support				
Specify Training to be provided		Specify Targeted Groups and Timeframe for Delivery		Specify Training Completed
<p>The following training is 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>NGOs 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>Prior to commencement of relevant Project activities.</p> <p>Maintained throughout Project implementation as required</p>		None