

FEDERAL GOVERNMENT OF SOMALIA



Ministry of Labor and Social Affairs

Shock Responsive Safety Net for Locust Response Project (SNLRP)

ENVIRONMENTAL and SOCIAL COMMITMENT PLAN (ESCP)

May 2020

Shock Responsive Safety Net for Locust Response Project (SNLRP)

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. *The Ministry of Labor & Social Affairs (MoLSA), of the Federal Republic of Somalia (hereinafter the Ministry of Labor & Social Affairs) is planning to implement the Shock Responsive Safety Net for Locust Response Project (SNLRP) (the **Project**), with the possible involvement of the following agency as service providers/implementing partner: World Food Programme (WFP). The International Development Association (hereinafter the Bank or the World Bank) has agreed to provide financing for the Project.*
2. *The Ministry of Labor & Social Affairs 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 Social Management Plan (SMP) to be developed for this project, Stakeholder Engagement Plan developed for this Project, 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 the timing of the material measures and actions. The Ministry of Labor & Social Affairs 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 Labor & Social Affairs 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 Labor & Social Affairs, 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 Labor & Social Affairs 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 Labor & Social Affairs. The Ministry of Labor & Social Affairs 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 Labor & Social Affairs 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.*

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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			
<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>WFP report to Project Implementation Unit (PIU) (integrated into the MoLSA) on a monthly basis.</p>	<p>Responsibility MoLSA</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 Bank in quarterly reports.</p>	<p>Responsibility: MoLSA</p> <p>Accountability: Head of PIU</p> <p>Funding: Project Funds</p>	<p>Throughout the Project implementation</p>

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SUMMARY ASSESSMENT			
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
<p>1.1 ORGANIZATIONAL STRUCTURE: A Project implementation unit (PIU) has been set up at MoLSA for Shock-Responsive Safety Net for Human Capital (SNHCP)– <i>Baxnaano</i>, including at least one Social Specialist. This PIU will apply for this project and will maintained throughout Project implementation</p> <p>MoLSA will sign service contracts acceptable to the Association with WFP to support the implementation Component 1 activities. WFP will be required to maintain qualified social specialists with experience managing and reporting on E&S risks under Shock-Responsive Safety Net for Human Capital (SNHCP)– <i>Baxnaano</i> for activities under this project.</p> <p>Mobilize and/or retain from Shock-Responsive Safety Net for Human Capital (SNHCP)– <i>Baxnaano</i> additional staff needed on short-term or long-term assignment in accordance with SMP institutional assessment/needs, including subject matter specialists on GBV/SEA, labor conditions (health & safety), Community engagement, and social inclusion.</p>	<p>Maintain throughout project implementation.</p> <p><i>Prior to carrying out of the relevant Project activities.</i> (Effectiveness conditions for categories 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>
<p>1.2 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 Social Management Plan (SMP) described in 1.3.</p>	<p>Already prepared and approved.</p> <p>Maintain throughout project implementation.</p>	<p>Responsibility: PIU</p> <p>Funding: Project Funds</p>	<p>As part of SMP revisions and ongoing throughout Project assessing the impacts according to SMP procedures</p>

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<p>1.3 MANAGEMENT TOOLS AND INSTRUMENTS: Update the Shock-Responsive Safety Net for Human Capital (SNHCP)– Baxnaano Social Management Plan (SMP) which establishes procedures to assess and manage social risks for the Project, which will include, inter alia, measures for the proper management of emergency cash transfers, measures to prevent and respond to gender-based violence, security risks, and a clear delineation of the roles and responsibilities of MoLSA and WFP and other entities involved in Project implementation to apply to activities under this project.</p> <p>MoLSA and WFP will be required to review and update the SMP annually (or as otherwise required) throughout Project implementation.</p> <p>Update, adopt and disclose the Shock-Responsive Safety Net for Human Capital (SNHCP)– Baxnaano Stakeholder Engagement Plan (SEP), including GRM, satisfactory to the World Bank to apply to activities under this project.</p>	<p>Already prepared and approved. Maintain throughout project implementation</p> <p>SEP already prepared. To be updated after community consultations</p>	<p>Responsibility: MoLSA</p> <p>Funding: Project Funds</p>	<p>Implemented throughout Project implementation</p>
<p>1.4 MANAGEMENT OF CONTRACTORS: Develop and implement procedures for managing contractors including WFP and subcontractors by the following:</p> <ul style="list-style-type: none"> • environmental and social requirements will be included in the procurement and contracting process including bidding documents, as applicable. • relevant requirements are included in contracts and subcontracts consistent with the requirements of ESSs; • codes of conduct are required for contractors and subcontractors and their workers; • monitor contractor commitment and compliance with ESSs 	<p>Prior to the preparation of procurement documents.</p> <p>Maintain procedures throughout Project implementation</p>	<p>Responsibility: MoLSA</p> <p>Accountability: Head of PIU</p> <p>Funding: Project Funds</p>	<p>Ongoing throughout Project implementation</p>

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<ul style="list-style-type: none"> • providing grievance redress mechanisms for contractor and subcontractor, communities and other stakeholders • ensure contractors provide details on contractor's oversight on environmental, social, health and safety (ESHS) performance • contractor to develop a grievance mechanism to handle concerns of their employees <p>These contracts will be monitored and enforced by MoLSA, as appropriate. WFP 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 updated SMP</p>			
<p>1.5 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>Where required, 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 each individual activity that require permits, consents and authorizations.</p> <p>Prior to procurement of contractors, goods and services for each such activity</p>	<p>Responsibility: MoLSA</p> <p>Accountability: Head of PIU</p> <p>Funding: Project Funds</p>	<p>Ongoing throughout Project implementation</p>

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1.6	<p>THIRD PARTY MONITORING:</p> <p>A third-party monitoring agent will be engaged by MoLSA, complemented by WFP field-based community monitors to support Project monitoring</p>	45 days after effective date	Responsibility: MoLSA Accountability: Head of PIU Funding: Project Funds	Throughout Project implementation
ESS 2: LABOR AND WORKING CONDITIONS				
2.1	<p>LABOR MANAGEMENT PROCEDURES:</p> <p>Update, adopt and disclose the Shock-Responsive Safety Net for Human Capital (SNHCP)– Baxnaano Labor Management Procedures (LMP) satisfactory to the World Bank to apply to activities under this project.</p>	Already prepared and approved. Maintain procedures throughout Project implementation	Responsibility: MoLSA Accountability: Head of PIU Funding: Project Funds	Implement throughout Project implementation
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS:</p> <p>Update, adopt the Shock-Responsive Safety Net for Human Capital (SNHCP)– Baxnaano grievance redress mechanism (GRM) for direct project workers as part of the LMP to apply to activities under this project.</p>	GRM operational prior to engaging project workers.	Responsibility: MoLSA Accountability: Head of PIU Funding: Project Funds	Maintained throughout Project implementation

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2.3	<p>OHS MEASURES: Implement appropriate occupational health and safety measures (OHS), including any emergency preparedness and response measures necessary, in accordance with the guidelines contained in the Shock-Responsive Safety Net for Human Capital (SNHCP) – Baxnaano Labor Management Procedures update to apply to activities under this project.</p> <p>The LMP will describe the occupational health and safety (OHS) measures applicable to WFP.</p>	<p>Already prepared and approved.</p> <p>Maintained throughout Project implementation</p>	<p>Responsibility: MoLSA</p> <p>Accountability: Head of PIU</p> <p>Funding: Project Funds</p>	Maintained throughout Project implementation.
2.4	<p>EMERGENCY PREPAREDNESS AND RESPONSE: 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.</p>	<p>Already prepared and approved.</p> <p>Maintained throughout Project implementation</p>	<p>Responsibility: MoLSA</p> <p>Accountability: Head of PIU</p> <p>Funding: Project Funds</p>	Maintained throughout Project implementation
2.5	<p>PROJECT WORKERS TRAINING: Project workers will receive training on humanitarian protection policies regarding 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. For Component 1, NGOs will receive training on the use of Food Security Cluster guidelines for community consultations and any other training in accordance with updated Shock-Responsive Safety Net for Human Capital (SNHCP)– Baxnaano LMP and GBV action plans, update to apply to activities under this project.</p>	<p>Training conducted throughout Project implementation.</p> <p>Maintained throughout Project implementation</p>	<p>Responsibility: MoLSA</p> <p>Accountability: Head of PIU</p> <p>Funding: Project Funds</p>	Maintained throughout Project implementation
2.6.	<p>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 included in the</p>	<p>Already prepared and approved.</p>	<p>Responsibility: MoLSA</p>	Maintained throughout Project implementation

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	Shock-Responsive Safety Net for Human Capital (SNHCP)– Baxnaano Security Management Plan (SMP) updated to apply to activities under this project.	Maintained throughout Project implementation	Accountability: Head of PIU Funding: Project Funds	
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT				
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 Shock-Responsive Safety Net for Human Capital (SNHCP)– Baxnaano Project Operations Manual updated to apply to activities under this project.	<i>Approved as part of the Project Operations Manual</i> Maintained throughout Project implementation	Responsibility: MoLSA Accountability: Head of PIU Funding: Project Funds	Maintained throughout Project implementation
ESS 4: COMMUNITY HEALTH AND SAFETY				
4.2	COMMUNITY HEALTH AND SAFETY: Measures and actions to assess and manage specific risks and impacts outlined in the Shock-Responsive Safety Net for Human Capital (SNHCP)– Baxnaano Social Management Plan and Security Management Plan updated to apply to activities under this project.	Already prepared and approved. Maintained throughout Project implementation	Responsibility: MoLSA Accountability: Head of PIU Funding: Project Funds	Maintained throughout Project implementation
4.3	GBV AND SEA RISKS: Update 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 and sexual exploitation and abuse (SEA) risks linked to registration or release of funds. These measures are already documented in the Shock-Responsive Safety Net for Human Capital (SNHCP)– Baxnaano GBV	Already prepared and approved. Maintained throughout Project implementation	Responsibility: MoLSA Accountability: Head of PIU Funding: Project Funds	Maintained throughout Project implementation

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<p>action plan included part of the Shock-Responsive Safety Net for Human Capital (SNHCP)– Baxnaano SMP. The plan includes 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. This plan will be updated to apply to activities under this project.</p>			
<p>4.5 EMERGENCY RESPONSE MEASURES: Measures defined in the Shock-Responsive Safety Net for Human Capital (SNHCP)– Baxnaano SMP will be updated to apply to activities under this project.</p>	<p>Already prepared and approved.</p> <p>Maintained throughout Project implementation</p>	<p>Responsibility: MoLSA</p> <p>Accountability: Head of PIU</p> <p>Funding: Project Funds</p>	<p>Maintained throughout Project implementation</p>
<p>4.6 SECURITY PERSONNEL: Process and procedures for possible deployment of security personnel already outlined in the Shock-Responsive Safety Net for Human Capital (SNHCP)– Baxnaano SMP and Shock-Responsive Safety Net for Human Capital (SNHCP)– Baxnaano LMP to apply to activities under this project.</p> <p>In the event that security personnel are 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.</p>	<p>Already prepared and approved.</p> <p>Maintained throughout Project implementation</p>	<p>Responsibility: MoLSA</p> <p>Accountability: Head of PIU</p> <p>Funding: Project Funds</p>	<p>Maintained throughout Project implementation</p>
<p>4.7 TRAINING FOR THE COMMUNITY: Under Component 1, WFP systems include mechanisms for community engagement and training as required for the Project to be undertaken</p>	<p><i>Prior to each service provider their contracted services</i></p>	<p>Responsibility: MoLSA</p> <p>Accountability: Head of PIU</p>	<p>Maintained throughout Project implementation</p>

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by local NGOs hired for the purpose. These mechanisms will apply for activities under this project		Funding: Project Funds	
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	<i>This standard is not relevant, as activities related to Land Acquisition, Restrictions on Land Use and Involuntary Resettlement are not envisioned.</i>		
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
	This standard is not relevant, as project activities do not include activities related to loss of biodiversity and living natural resources		
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
	This standard is not relevant, as there are no persons that meet the identification criteria for IP/SSAHUTLCs		
ESS 8: CULTURAL HERITAGE			
	This standard is not relevant, as the project does not touch on activities related to cultural heritage		
ESS 9: FINANCIAL INTERMEDIARIES			
	This standard is not relevant, as the project has no financial intermediaries		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			

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10.1	<p>SEP PREPARATION: Prepare and disclose updated Shock-Responsive Safety Net for Human Capital (SNHCP)– Baxnaano SEP to apply to activities under this project, and continuously update as required</p>	<p>SEP already prepared. To be updated after community consultations</p> <p>To be updated regularly throughout Project implementation</p>	<p>Responsibility: MoLSA Accountability: Head of PIU</p> <p>Funding: Project Funds</p>	Throughout project implementation
10.2	<p>SEP IMPLEMENTATION: Implement the SEP.</p>	Throughout project implementation	<p>Responsibility: MoLSA Accountability: Head of PIU</p> <p>Funding: Project Funds</p>	Throughout project implementation
10.3	<p>PROJECT GRIEVANCE MECHANISM: Update the Shock-Responsive Safety Net for Human Capital (SNHCP)– Baxnaano Grievance Redress Mechanism, as part of the SEP to apply to activities under this project.</p>	<p><i>Prior to carrying out of the relevant Project activities</i> SEP already prepared. To be updated after community consultations</p>	<p>Responsibility: MoLSA Accountability: Head of PIU</p> <p>Funding: Project Funds</p>	Throughout Project implementation
Capacity Support				
<i>Specify Training to be provided</i>		<i>Specify Targeted Groups and Timeframe</i>	<i>Specify Training Completed</i>	
<p>All capacity building activities and trainings will be further detailed in the SMP and the LMP, trainings may be required in:</p> <ul style="list-style-type: none"> • Stakeholder engagement • World Bank ESS • Occupational and Community Health and Safety 		PIU staff, Third party hires and other project workers	None	

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<ul style="list-style-type: none">• Emergency preparedness and response• Gender-Based Violence Risk Mitigation• Grievance Management• Labor management procedures• Security Management• Code of conduct for project workers			