



Federal Government of Somalia
Ministry of Interior, Federal Affairs and Reconciliation

BULSHO: Strengthening Community and Local Institutions for Social Cohesion, Inclusion and Resilience (P508408)

DRAFT

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

Negotiated Version

March 20, 2025

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Federal Republic of Somalia (**the Recipient**) will implement the Bulsho: Strengthening Community and Local Institutions for Social Cohesion, Inclusion and Resilience (**the Project**), with the Leadership and implementation of the Ministry of Interior, Federal Affairs and Reconciliation (MoIFAR) and Federal Member States (FMS) Interior Ministries, as set out in the Financing Agreement and the Grant Agreement (collectively, **the Agreements**). The International Development Association (**the Association**), has agreed to provide the financing for the Project, as set out in **the Agreements**.
2. **The Recipient** shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to **the Association**. The ESCP is a part of **the Agreements**. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the Agreements.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that **the Recipient** shall carry out or cause to be carried out, including, as applicable, their respective timeframes; institutional, staffing, training, monitoring and reporting arrangements; and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be prepared or updated, consulted, disclosed and implemented under the Project, consistent with the ESSs, in form and substance acceptable to **the Association**. Said E&S instruments may be revised from time to time with prior written agreement by **the Association**. As provided for under the referred Agreement, **the Recipient** shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.
4. As agreed by **the Association** and **the Recipient**, this ESCP will be revised from time to time, if necessary, to reflect adaptive management of Project changes or unforeseen circumstances or in response to Project performance. In such circumstances, **the Association** and **the Recipient** agree to update the ESCP to reflect these changes through an exchange of letters signed between **the Association** and **the Recipient's** Representative specified in the Agreement or the Minister in the Ministry of Interior, Federal Affairs and Reconciliation. **The Recipient** shall promptly disclose the updated ESCP.
5. The subsection on “Indicators for Implementation Readiness” below identifies the actions and measures to be monitored to assess Project readiness to begin implementation in accordance with this ESCP. Nevertheless, all actions and measures in this ESCP shall be implemented as set out in the “Timeframe” column below irrespective of whether they are listed in the referred subsection.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT			
A	<p>ORGANIZATIONAL STRUCTURE</p> <ol style="list-style-type: none"> Establish and maintain a Project Coordination Unit (PCU) at the FGS level with qualified full-time staff and resources to support the management and coordination of environmental, social, health, safety and security risks and impacts of the Project including one full-time Environmental Specialist, one full-time Social Specialist and one part-time GBV-SEA/SH Specialist to operationalize the GBV-SEA/SH Action Plan. The ToRs for the GBV specialist will include the provision to train the Social specialist to ensure continuity on SEA/SH risk management. Establish and Maintain Project Implementation Unit (PIU) at the FMS level and nominate staff or hire consultants as E&S Focal Points to support management of environmental, social, health, safety and security risks and impacts of the Project at the FMS level. Where needed, engage specialists with expertise in specific areas, such as stakeholder engagement, grievance management, Occupational Health and Safety (OHS), among others. 	<ul style="list-style-type: none"> Establishment of PCU upon approval of the Project. Within 90 days after Project Effective Date for recruitment of the E&S and GBV specialists and nomination of the E&S focal points and maintained throughout Project implementation. 	PCU PIU
B	<p>CAPACITY BUILDING PLAN/MEASURES</p> <p>Prepare and implement the following capacity building measures:</p> <ol style="list-style-type: none"> Train all Project workers, including community workers, on the Bank's Environmental and Social Framework (ESF), and provisions in the ESCP, Stakeholder Engagement Plan (SEP), Labor Management Procedures (LMP), Sexual Exploitation and Abuse (SEA)/Sexual Harassment (SH) Prevention and Response Action Plan, E&S screening procedures, Environmental and Social Management Plan (ESMP), sub-project exclusion list, and Project-wide GBV -responsive and workers grievance mechanisms (GM), in form and substance satisfactory to the Association. All capacity building interventions will be held in locations and using formats accessible to all, and information disseminated in languages understandable to all. Create awareness to beneficiaries and train all Project workers on the provisions of the activity-specific ESMP and E&S screening procedures, Project-wide GBV-responsive GM, community health and safety, as well as emergency preparedness and response under this ESCP, the E&S instruments referenced herein and the ESSs, in form and substance satisfactory to the Association. Train all Project workers on the Project's Security Management Plan, including on emergency prevention and preparedness and response arrangements to emergency situations. Train Project workers on Occupational Health and Safety (OHS) and SEA/SH Incident Reporting procedure. Train all Project workers on the Code of Conduct (CoC). 	Within 90 days after Project Effective Date and thereafter, undertake refresher trainings annually and as needed during the Project implementation.	PCU PIU
MONITORING AND REPORTING			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
C	<p>REGULAR REPORTING</p> <p>Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project. The reports shall include:</p> <ul style="list-style-type: none"> • Status of preparation and implementation of E&S instruments required under the ESCP, including LMP, SEP, Security Management Plan (SecMP), and the Sexual Exploitation and Abuse and Sexual Harassment Prevention and Response Action Plan. • Summary of stakeholder engagement activities carried out as per the SEP. • Complaints submitted to the GMs, the grievance log, and progress made in resolving them. • ESHS performance of contractors and subcontractors as reported through monthly contractors' and supervision firms' reports. • Number and status of resolution of incidents and accidents reported under action E below. 	Submit quarterly and annual reports to the Association throughout Project implementation, commencing 90 days after the Effective Date. Submit each report to the Association within 45 days after the end of the quarter.	PCU PIU
D	<p>CONTRACTORS' MONTHLY REPORTS</p> <p>Require contractors and supervising firms (where applicable) to provide monthly monitoring reports on E&S performance to the SS, in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the Association.</p>	Submit the monthly reports to the Association as annexes to the reports to be submitted under action C above.	PCU PIU
E	<p>INCIDENTS AND ACCIDENTS</p> <p>Notify the Association of any incident or accident relating to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including those resulting in death or significant injury to workers or the public; acts of violence, discrimination or protest; unforeseen impacts to cultural heritage or biodiversity resources; pollution of the environment; dam failure; forced or child labor; displacement without due process (forced eviction); allegations of sexual exploitation and abuse (SEA), or sexual harassment (SH); or disease outbreaks. Provide available details of the incident or accident to the Association upon request.</p> <p>Arrange for an appropriate review of the incident or accident to establish its immediate, underlying and root causes. Prepare, agree with the Association, and implement a Corrective Action Plan that sets out the measures and actions to be taken to address the incident or accident and prevent its recurrence.</p>	<p>Notify the Association no later than 48 hours after learning of the incident or accident. Provide available details upon request.</p> <p>Provide review report and Corrective Action Plan to the Association no later than 10 days following the submission of the initial notice, unless a different timeframe is agreed to in writing by the Association.</p>	PCU PIU
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.1	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS</p> <ol style="list-style-type: none"> 1. Prepare a template Environmental and Social Management Plan (ESMP) for the Project, a sub-project exclusion criteria for social and economic investments, and E&S screening procedures as part of the Project's Operation Manual (POM) consistent with all the relevant ESSs. 2. Prepare and implement site-specific Environmental and Social Management Plans (ESMPs) for subprojects supported under Component 3 of the Project, consistent with the relevant ESSs. The activities described in the sub-project exclusion list set out in Part 1.4 below shall be ineligible to receive financing under the Project. 	<ol style="list-style-type: none"> 1. Prepare a template ESMP consistent with applicable ESSs, sub-project exclusion criteria for social and economic investments and E&S screening procedures as an annex to the POM prior to the Effective Date. 2. Prepare the site-specific ESMPs and incorporate the ESMPs as part of the respective bidding documents for the respective subproject or Project activity implementation plan prior to the carrying out of subproject or Project activity that requires the preparation of such ESMP. Once finalized, implement the respective ESMP throughout Project implementation. 	PCU PIU
1.2	<p>MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the relevant aspects of the ESCP, including, inter alia, site-specific ESMPs, the LMP, and CoC, into the E&S specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply and that they require their subcontractors to comply with the E&S specifications of their respective contracts. Provide copies of the relevant contracts with contractors/subcontractors and supervision firms to the Association.</p>	<p>As part of the preparation of procurement documents and respective contracts. Supervise contractors throughout Project implementation. Copies of relevant contracts provided to the Association upon request.</p>	PCU PIU
1.3	<p>TECHNICAL ASSISTANCE</p> <ol style="list-style-type: none"> 1. Carry out the consultancies, studies (including feasibility studies, if applicable), policies, legislations, regulations and guidelines, capacity building, training, and any other technical assistance activities under the Project, including, inter alia, the SEA/SH Prevention and Response Action Plan in accordance with terms of reference acceptable to the Association, that are consistent with the ESSs. Thereafter prepare and finalize the outputs of such activities in compliance with the terms of reference. 	<ol style="list-style-type: none"> 1. Throughout Project implementation. 2. ToRs for TA activities shall be reviewed and approved by the Association before commencing TA activities. 	PCU PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	2. MoIFAR shall submit to the Association for non-objection the ToRs and outputs of the TA, thereby allowing the Association a chance to review them and confirm their consistency with the ESF.		
1.4	EXCLUSIONS Exclude the following types of activities/sub-projects as ineligible for financing under the project: <ul style="list-style-type: none"> Activities or sub-projects classified as High Risk under the World Bank Environmental and Social Framework. Activities that have a high probability of causing serious adverse effects to human health and to the environment. Activities that expose workers/communities to significant health and personal safety risks Activities that may adversely affect lands or rights of Traditional Ethnic Minorities (TEMs) or other vulnerable groups. Associated facilities which do not meet the requirements of the ESSs, whether the beneficiaries have, or do not have control or influence over such associated facilities. Activities that may have significant adverse social impacts and/ or may give rise to significant social or community conflict. Sub-projects and activities with either adverse impacts on land or natural resources under traditional/customary use or have risks associated with the relocation of TEMs and other vulnerable groups in Somalia, coupled with any negative impact on their cultural sites or heritage. Such as the permanent restrictions of access to communal property and/or natural resources and physical cultural heritage. Activities that may involve economic displacement of more than 200 PAPs. Activities that involve sites with high biodiversity values, or have impacts on biodiversity, critical habitats and protected areas shall be excluded, regardless of the design alternatives for this specific location. Activities that may lead to significant conversion or degradation of critical natural habitats or cultural heritage sites Activities that may cause damage to cultural heritage as defined in ESS8. Activities that may involve generating large volumes of e-waste causing significant irreversible adverse impacts to human health and natural resources. Activities that limit access for disadvantaged groups such as those with literacy, disability and mobility challenges -(e.g., public offices with no ramps to, inaccessible websites, etc.). 	Screen all activities and sub-projects against the exclusion list at identification stage and prior to sub-project or activity approval. Where the facilities are controlled by third parties, an ESIA, ESHS Audit, or other similar evaluation shall be carried out before the sub-project is approved by the Association.	PCU PIU
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	LABOR MANAGEMENT PROCEDURES	Implement the LMP throughout Project implementation.	PCU PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Prepare and implement Project LMP , including, inter alia, provisions on working conditions, management of workers relationships, occupational health and safety (including personal protective equipment, and emergency preparedness and response), code of conduct (including relating to SEA and SH), forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms.		
2.3	GRIEVANCE MECHANISM FOR PROJECT WORKERS Establish, publicize, maintain, and operate a GM for Project workers (direct and contracted), including assignment of workers' grievance focal points, as described in the LMP and consistent with ESS2. Establish and operate a separate GM for Community workers consistent with ESS 2.	Establish and operationalize the GM for direct and contracted workers, and a separate GM for community workers before disbursement for components 1-3 , and thereafter maintain, publicize and operate it throughout Project implementation.	PCU PIU
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	WASTE MANAGEMENT PLAN Prepare and implement a Waste Management Plan (WMP), as part of the site-specific ESMPs prepared for the investments under Component 3, to manage hazardous and non-hazardous wastes, consistent with ESS3.	Prepare the WMP, as part of the site-specific ESMPs before commencement of subproject activities, and thereafter implement the WMP throughout Project implementation.	PCU PIU
3.2	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT Incorporate resource efficiency and pollution prevention and management measures in the site-specific ESMPs to be prepared under action 1.1 above.	Same timeframe as for the preparation and implementation of the site-specific ESMPs.	PCU PIU
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	TRAFFIC AND ROAD SAFETY Incorporate measures to manage traffic and road safety risks as required in the site-specific ESMPs to be prepared under action 1.1 above.	Same timeframe as for the preparation and implementation of the site-specific ESMPs.	PCU PIU
4.2	COMMUNITY HEALTH AND SAFETY Assess and manage specific risks and impacts to the community arising from Project activities, including, inter alia, behavior of Project workers, risks of labor influx, security, response to emergency situations, and include mitigation measures in the site-specific ESMPs to be prepared.	Same timeframe as for the preparation and implementation of the site-specific ESMPs.	PCU PIU
4.3	SEA AND SH RISKS	Implement it throughout Project implementation.	PCU PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Prepare and implement a SEA/SH Prevention and Response Action Plan to assess and manage the risks of SEA and SH.		
4.4	<p>SECURITY MANAGEMENT</p> <p>Assess and implement measures to manage the security risks of the Project, including the risks of engaging security personnel to safeguard Project workers, sites, assets, and activities as set out in the Security Management Plan (SecMP).</p>	Security Management Plan (SecMP) shall be prepared and adopted prior to disbursement of funds for activities under Components 1- 3 of the Financing Agreement.	PCU PIU
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	<p>RESETTLEMENT [FRAMEWORK] [PLAN] or [PLANS]</p> <p>1. Include in the Project Operations Manual (POM), a simplified Resettlement Action Plan (RAP) template consistent with ESS 5.</p> <p>2. Voluntary Land Donation. Considering that the implementation of Component 3 activities (social and economic infrastructure investments) will follow the Community-Led Development (CLD) approach, there are cases where it may be proposed that part or all of the land used by the Project to implement the social and economic investments is donated voluntarily without payment of full compensation. In line with ESS5, footnote 10 and subject to prior Bank approval, this may be acceptable provided MoIFAR demonstrates that: (a) the potential donor or donors are the owners of the land (with evidence in writing) and they have been appropriately informed and consulted about the Project and the choices available to them, and their right to compensation disclosed; (b) potential donors are aware that refusal to donate land is an option, and have confirmed in writing their willingness to proceed with the donation; (c) the amount of land being donated is minor and will not reduce the donor's remaining land area below that required to maintain the donor's livelihood at current levels; (d) no household/business relocation is involved; (e) the donor is expected to benefit directly from the Project; and (f) for community or collective land, donation can only occur with the written consent of individuals using or occupying the land. In addition, MoIFAR will maintain a transparent record of all consultations and agreements reached, as well as evidence of land ownership.</p>	<p>1. Prepare a simplified RAP template consistent with ESS 5, as an annex to the POM prior to the Effective Date.</p> <p>- Prepare and implement the respective RAP prior to carrying out the relevant works, including ensuring that before taking possession of the land and related assets, full compensation has been provided and, as applicable, displaced people have been resettled and moving allowances have been provided.</p> <p>2. Demonstrate fulfillment of the voluntary land donation provisions in line with the ESF before taking possession of land.</p>	PCU PIU
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
6.1	BIODIVERSITY RISKS AND IMPACTS Assess and manage impacts on biodiversity for activities under component 3 consistent with ESS 6, as part of the site-specific ESMPs.	Same timeframe as for the preparation and implementation of the site-specific ESMPs and thereafter implement the site specific ESMPs throughout Project implementation.	PCU PIU
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	INDIGENOUS PEOPLES [FRAMEWORK] [PLAN] or [PLANS] 1. Include in the SEP under section 10.1, a stand-alone chapter outlining measures to mitigate adverse impacts on Traditional Ethnic Minorities and ensure their meaningful consultation and access to Project benefits and opportunities in a culturally appropriate manner , consistent with ESS7. 2. Engage Traditional Ethnic Minorities present in BULSHO Project areas and organizations representing their interests and update and re-disclose the SEP within 90 days after the effective date.	1. Prior to appraisal and thereafter implement the provisions throughout Project implementation. 2. Engage Traditional Ethnic Minorities and update and re-disclose the SEP within 90 days after the effective date.	PCU PIU
ESS 8: CULTURAL HERITAGE			
8.1	CULTURAL HERITAGE RISKS AND IMPACTS Assess and manage impacts on physical cultural heritage for activities under component 3 consistent with ESS 8, as part of the site-specific ESMPs.	Same timeframe as for the preparation and implementation of the site-specific ESMPs and thereafter implement the site specific ESMPs throughout Project implementation.	PCU PIU
8.2	CHANCE FINDS Describe and implement the chance finds procedures, as part of the site specific ESMP for each of the sub-project under component 3. Include in the template ESMP provisions for Chance Finds Procedures consistent with ESS8.	Describe the chance find procedures in the template ESMP annexed to the POM before effective date and Implement the procedures throughout Project implementation.	PCU PIU
ESS 9: FINANCIAL INTERMEDIARIES [This standard is only relevant for Projects involving Financial Intermediaries (FIs).]			
9.1	The ESS9 on Financial Intermediaries is not relevant to the Project		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN	Implement the SEP throughout Project implementation.	PCU PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>Prepare and implement a SEP for the Project, consistent with ESS10, which shall include measures to, inter alia, provide stakeholders with timely, relevant, understandable, and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination, and intimidation. The SEP shall be updated, when necessary, throughout Project implementation to reflect any adjustment in Project activities and actors, as well as the views of beneficiaries and other relevant stakeholders.</p> <p>The SEP to include a stand-alone chapter on measures to mitigate adverse impacts on Traditional Ethnic Minorities and ensure their meaningful consultation and access to Project benefits.</p> <p>Engage Traditional Ethnic Minorities and update and re-disclose the SEP within 90 days after the effective date.</p>	Update and re-disclose the SEP within 90 days after the effective date.	
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>Establish, publicize, maintain, and operate an accessible GM, to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10.</p> <p>The GM shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.</p> <p>Describe in the SEP, the GM to address complaints submitted by Traditional Ethnic Minorities. The Project GM will be culturally appropriate and accessible to Traditional Ethnic Minorities and considers the availability of judicial recourse and customary dispute settlement mechanisms among them.</p>	Establish the GM before disbursement for components 1-3 and thereafter maintain and operate the mechanism throughout Project implementation.	PCU PIU
INDICATORS FOR IMPLEMENTATION READINESS			
<p>The following actions are indicators for implementation readiness:</p> <p>A, B, 1.1, 1.3, 1.4, 2.3, 4.3, 4.4, 5.1, 7.1, 8.1, 8.2 and 10.2</p>			