

THE FEDERAL REPUBLIC OF SOMALIA



MINISTRY OF FINANCE (MOF)

**Somalia Recurrent Cost & Reform Financing Project –
Phase 3 (P17373)**

Third Additional Financing

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

Appraisal Version

27th April, 2026

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Federal Republic of Somalia (**the Recipient**) through the Federal Ministry of Finance will implement the Somalia Recurrent Cost & Reform Financing Project - Phase 3 (the Project), with the involvement of the Federal Member States Ministries of Finance as set out in the Financing Agreement. The International Development Association (the Association) has agreed to provide financing for the Project. This Environmental and Social Commitment Plan (ESCP) supersedes previous versions of the ESCP for the Project and shall apply both to the original and the additional financing for Project referred to above.
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 Agreement.
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) documents 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 documents 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 **Recipient, Minister of Finance of Somalia**. **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	ORGANIZATIONAL STRUCTURE Maintain a national Project Implementation Unit (PIU) with qualified staff and resources to support management of ESHS risks and impacts of the Project, including one senior social safeguard specialist with GBV functions and one social specialist both supporting implementation at Federal Government of Somalia (FGS) and Federal Member State (FMS) levels.	The National PIU shall be maintained throughout Project implementation.	Ministry of Finance Somalia
B	CAPACITY BUILDING PLAN/MEASURES Training topics for personnel involved in Project implementation shall, among others, include: • Stakeholder engagement • Relevant World Bank ESSs • Occupational and Community Health and Safety • Medical waste management • E-waste management • Application of the Project ESMF • SEA/SH and Gender-Based Violence Risk Mitigation • Grievance Management • Labor Management Procedures • Security Management Plan	Throughout Project implementation.	Ministry of Finance Somalia
MONITORING AND REPORTING			
C	REGULAR REPORTING Prepare and submit to the Bank regular monitoring reports on the environmental, social, health and safety (E&S) performance of the Project. The reports shall include: • Status of preparation and implementation of E&S documents required under the ESCP. • Summary of stakeholder engagement activities carried out as per the Stakeholder Engagement Plan. • Complaints submitted to the grievance mechanism(s), the grievance log, and progress made in resolving them. • E&S 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.	Continue to submit quarterly reports to the Association throughout Project implementation. Submit each report to the Association no later than 15 days after the end of each reporting period.	Ministry of Finance Somalia

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
E	INCIDENTS AND ACCIDENTS Notify the Bank 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 or abuse (SEA), or sexual harassment (SH); or disease outbreaks. Provide available details of the incident or accident to the Bank upon request. Arrange for an appropriate review of the incident or accident to establish its immediate, underlying and root causes. Prepare, agree with the Bank, 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.	Notify the Bank no later than 48 hours after learning of the incident or accident. Provide available details upon request. Provide review report and Corrective Action Plan to the Bank no later than 10 days following the submission of the initial notice, unless a different timeframe is agreed to in writing by the Bank.	Ministry of Finance Somalia
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS 1. Implement the Environmental and Social Management Framework (ESMF) including an E-waste plan and SEA/SH prevention and response plan that was updated under AF 2, consistent with the relevant ESSs satisfactory to the Association. 2. Implement a Medical Waste Management Plans, Environmental and Social Management Plans (ESMPs) and/or other instruments, if required for the respective Project AF activities based on the screening and assessment process, in accordance with the ESSs, the ESMF, the World Bank Group Environmental Health and Safety Guidelines (EHSGs) and other relevant Good International Industry Practice (GIIP) in a manner acceptable to the Association.	1. Implement the ESMF including an E-waste plan and SEA/SH prevention and response plan throughout Project implementation. 2. Adopt instruments before carrying out relevant Project activities.	Ministry of Finance Somalia
1.2	MANAGEMENT OF CONTRACTORS Incorporate the relevant aspects of the ESCP, including, inter alia, the Labor Management Procedures, and code of conduct, 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 Bank.	As part of the preparation of procurement documents and respective contracts. Supervise contractors throughout Project implementation. Copies of relevant contracts provided to the Bank upon request.	Ministry of Finance Somalia

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.3	TECHNICAL ASSISTANCE Ensure that the consultancies, studies, capacity building, training, and any other technical assistance activities under the Project are carried out in accordance with terms of reference acceptable to the Association and consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.	Throughout Project implementation.	Ministry of Finance Somalia
1.4	EXCLUSIONS Specify in the grant manual agreement to be signed between Recipient and FMS eligible activities and E&S requirements in accordance with the ESMF. Exclude the following type of activities as ineligible for financing under the Project: a. Any infrastructure works beyond minor rehabilitation will be excluded from the Project under AF component 2.4. b. Activities that may cause long term, permanent and/or irreversible adverse impacts (e.g., loss of a natural habitat). c. Activities that have high probability of causing serious adverse effects to human health and/or the environment not related to treatment of COVID-19 cases. d. Activities that may have significant adverse social impacts and may give rise to significant social conflict. e. Activities that involve adverse impacts for people and communities described in ESS7. f. Activities that may affect lands or rights of Vulnerable and Marginalized Groups or other vulnerable minorities. g. Activities that may involve permanent resettlement or land acquisition or adverse impacts on cultural heritage. All the other excluded activities are set out in the ESMF.	During the assessment process conducted under action 1.1 above.	Ministry of Finance Somalia
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	LABOR MANAGEMENT PROCEDURES Implement the Labor Management Procedures (LMP) for the Project	Implement the LMP updated under AF 2 throughout project implementation.	Ministry of Finance Somalia
2.2	OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN Require contractors and subcontractors to prepare and implement OHS Management Measures or Plan in accordance with LMP.	Throughout Project implementation.	Ministry of Finance Somalia

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
2.3	GRIEVANCE MECHANISM FOR PROJECT WORKERS Maintain, and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.	Throughout Project implementation.	Ministry of Finance Somalia
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	WASTE MANAGEMENT PLAN Without prejudice to the prohibition in action 1.4 above, relevant aspects of this standard shall be considered, as needed, under action 1.1 above, including, inter alia, measures to: manage health care wastes and other types of hazardous and non-hazardous wastes as described in the ESMF and the medical waste management plan (MWMP).	Throughout Project implementation.	Ministry of Finance Somalia
3.2	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT Incorporate resource efficiency and pollution prevention and management measures in the specific MWMPs to be prepared under action 3.1 above.	Same timeframe as for the preparation and implementation of the MWMP.	Ministry of Finance Somalia
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	COMMUNITY HEALTH AND SAFETY Without prejudice to the prohibition in action 1.4 above, relevant aspects of ESS4 shall be considered, as needed, under action 1.1 above, including, inter alia, measures to: minimize the potential for community exposure to communicable diseases; ensure that individuals or groups who, because of their particular circumstances, may be disadvantaged or vulnerable have access to the development benefits resulting from the Project; manage the risks of the use of security personnel, if any; manage the risks of labor influx; and prevent and respond to cases of SEA/SH.	Throughout Project implementation.	Ministry of Finance Somalia
4.2	SEA AND SH RISKS Implement a SEA/SH Prevention and Response Action Plan to assess and manage the risks of SEA and SH.	Implement the SEA/SH Prevention and Response Action Plan prepared under 1.1 above throughout project implementation.	Ministry of Finance Somalia
4.3	SECURITY MANAGEMENT 1. Adopt and implement standards, protocols, and codes of conduct for the selection and assignment of security personnel to the Project, and screen security personnel to verify that they have not engaged in past unlawful or abusive behavior, including sexual exploitation and abuse (SEA), sexual harassment (SH) or excessive use of force.	Prior to engagement of Security Personnel	PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	2. Enter into a memorandum of understanding (MoU), with the relevant authority at national, state and district level in charge of security setting out the arrangements for the engagement of the security personnel in the Project, including the relevant actions and measures set out in this ESCP.		
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	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	INDIGENOUS PEOPLES [FRAMEWORK] [PLAN] or [PLANS] Where groups fitting the ESS7 criteria are present in the Project areas, measures shall be taken to include female health workers (FHWs) of those communities and consultant them in 2.4 activities, along with the applicable measures defined in the Project's ESHS instruments.	Throughout Project implementation.	Ministry of Finance Somalia
ESS 8: CULTURAL HERITAGE			
8.1	This standard is not relevant for the Project.		
ESS 9: FINANCIAL INTERMEDIARIES [This standard is only relevant for Projects involving Financial Intermediaries (FIs).]			
9.1	This standard is not relevant for the Project.		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN Update the Stakeholder Engagement Plan (SEP) for the original Project and updated under AF 2, 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.	Updated the SEP and redisclosed prior to appraisal and thereafter implemented throughout Project.	Ministry of Finance Somalia
10.2	PROJECT GRIEVANCE MECHANISM Publicize, maintain, and operate an accessible grievance mechanism, 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.	Throughout Project implementation.	Ministry of Finance Somalia

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	The grievance mechanism 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. The grievance mechanism 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.		
INDICATORS FOR IMPLEMENTATION READINESS			
The following actions are indicators for implementation readiness: i. Maintain the National PIU with E&S staff ii. Update and redisclose a Stakeholder engagement plan (SEP).			