

FEDERAL REPUBLIC OF SOMALIA



MINISTRY OF FINANCE

**Somalia Enhancing Public Resource
Management Project**

SERP (P177298)

Additional Financing & Restructuring

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

29 April 2026

1. The Federal Republic of Somalia (“Recipient”), through the Ministry of Finance (MoF) is implementing the **Somalia Enhancing Public Resource Management Project (P177298)** (the Project), as set out in the Original Financing Agreement and the Original Grant Agreement (the Agreements). The International Development Association (the Association), has agreed to provide the original financing and additional financing for the Project, as set out in the Agreements. This ESCP supersedes previous versions of the ESCP for the Project and shall apply both to the original and the additional financing for the 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 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) 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 Agreements, 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 through the Minister responsible for finance. 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 the PCU with qualified staff and resources to support management of environmental, social, health and safety risks and impacts of the Project including a Social Specialist, an Environmental Specialist, and GBV Specialist.	Maintain the PIU and these positions throughout Project implementation.	FGS
B	CAPACITY BUILDING PLAN/MEASURES Prepare and implement the following capacity building measures: training for PIU staff, stakeholders, communities, Project workers on stakeholder mapping and engagement, specific aspects of environmental and social assessment, emergency preparedness and response, community health and safety.	Implement the Capacity Building Plan throughout project implementation.	FGS
MONITORING AND REPORTING			
C	REGULAR REPORTING Prepare and submit to the Association 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, no later than 45 days after the end of each reporting period.	FGS
D	CONTRACTORS' MONTHLY REPORTS	Submit the monthly reports as annexes to the quarterly reports to be submitted under action C above.	FGS

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Require contractors and supervising firms to provide monthly monitoring reports on E&S performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the Association.		
E	INCIDENTS AND ACCIDENTS 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 or abuse (SEA), or sexual harassment (SH); or disease outbreaks. Provide available details of the incident or accident to the [Bank/Association] 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/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.	Notify the Association 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 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.	FGS
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS 1. Implement an Environmental and Social Management Framework (ESMF) for the Project, consistent with the relevant ESSs. 2. Implement the site-specific and Social Management Plans (ESMPs) prepared in the original project, and prepare any subsequent ESMPs as necessary, as set out in the ESMF. The proposed subprojects' activities described in the exclusion list set out in the ESMF shall be ineligible to receive financing under the Project.	Implement the Project ESMPs that as prepared and approved under original Project, and implement throughout Project implementation. Prepare any additional ESMP as required. Incorporate ESMPs as part of the respective bidding documents for the respective subproject prior to the carrying out of subproject activity that requires the preparation of such ESMP. Implement the respective ESMPs throughout Project implementation.	FGS

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.2	MANAGEMENT OF CONTRACTORS Incorporate the relevant aspects of the ESCP, including, inter alia, the Labor Management Procedures, Stakeholder Engagement Plan (SEP), Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) 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 Association. Develop and implement procedures for managing contractors and subcontractors recruited to carry out civil works including ensuring that: - Contractors comply with the national laws, e.g., licenses to operate and excavate any sites for project purposes. - Relevant environmental and social requirements are included in the procurement and contracting process including bidding documents, contracts and subcontracts consistent with the requirements of ESSs. - Contractors submit an ESMP including all E&S requirements as part of the bidding process and show that they have sufficient staff and capacity to carry it out. - Contractors are made aware of requirements for Codes of conduct (CoCs), which applies also to subcontractors, primary suppliers and their workers and which cover conditions of service, occupational health and safety (OHS), gender-based violence (GBV) and security requirements. - Contractors' commitment and compliance with ESSs are monitored. - There is provision of GRM for contractors and subcontractors, primary suppliers, communities and other stakeholders as well as employees. - Contractors and primary suppliers provide details on their oversight on environmental, social, health and safety (ESHS) performance and adequate mechanisms for serious incident reporting should it be required. - The performance of the contractors and primary suppliers is monitored to ensure that they comply with the ESHS specifications of their respective contracts in accordance with the LMP, SEAH Prevention and Response Action Plan, and Security Management Plan.	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.	FGS
1.3	TECHNICAL ASSISTANCE Carry out the consultancies, studies (including feasibility studies, if applicable), capacity building, training, and any other technical assistance activities under the Project in accordance with terms of	Throughout Project implementation.	FGS

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	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.		
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	LABOR MANAGEMENT PROCEDURES Implement the Labor Management Procedures (LMP) for the Project and address labor risks, including (but not limited to) • conditions of service. • code of conduct. • occupational, health and safety (OHS) measures. • prevention of child and forced labor. • emergency preparedness and response. • grievance redress mechanism for project workers. • training of project workers on key issues including OHS and GBV prevention. • management of labor influx.	Continue implementation of existing LMP, and update as necessary during project implementation.	FGS
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.	Implement the OHS Management Plan throughout Project implementation and update as and when necessary.	FGS
2.3	GRIEVANCE MECHANISM FOR PROJECT WORKERS Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.	Continue operationalization of original Project grievance mechanism and thereafter maintain and operate it throughout Project implementation.	FGS
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	WASTE MANAGEMENT PLAN Implement the Waste Management Plan (WMP), prepared as part of the ESMP for the Project, to manage hazardous and non-hazardous wastes, consistent with ESS3.	Implement the WMP throughout Project implementation	FGS
3.2	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT Implement resource efficiency and pollution prevention and management measures in the ESMP to be prepared under action 1.1 above.	same timeframe as for the preparation and implementation of the ESMP.	FGS

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	TRAFFIC AND ROAD SAFETY Implement measures to manage traffic and road safety risks as required in the ESMP prepared under action 2.1 above.	Same timeframe as for the preparation and implementation of the ESMP.	FGS
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, response to emergency situations, and include mitigation measures in the ESMPs to be prepared in accordance with the ESMF.	Same timeframe as for the preparation and implementation of the ESMPs.	FGS
4.3	SEA AND SH RISKS Implement the SEA/SH Action Plan prepared under the original Project to assess and manage the risks of SEA and SH. Key measures include: ▪ CoCs for project and contracted workers; and plan for sensitization/awareness raising for the community and intended training activities for workers on CoC and GBV/SEA provisions. ▪ Mapping and development of partnerships with identified GBV service providers. ▪ A Reporting and Response Framework that outlines key requirements for reporting cases if they arise and measures to enable safe, ethical, survivor-centered response. ▪ An Accountability Framework that outlines how the PSC/contractor will handle allegations, including related to investigation (in alignment with national processes) and sanctions for potential perpetrators. ▪ Establishment of special channel/procedures for safe, confidential and survivor centered reporting of GBV incidence that connect to the project GRM and enable training of GRM operators on how to respond to cases that come forward.	Implement the SEA/SH Action Plan throughout Project implementation.	FGS
4.4	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	FGS

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. There are no project activities that could lead to land acquisition, restrictions on land use, or involuntary resettlement in the project design and scope. Should the project scope change during preparation or implementation to include activities that may trigger ESS5, a reassessment will be conducted, ESCP revised and appropriate instruments developed in accordance.		
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	This standard is not relevant. Activities relating to the use of Biodiversity Conservation and Sustainable Management of Living Natural Resources are currently not being considered under this project.		
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES [			
7.1	This standard is relevant. Given the absence of adverse impacts, Free, Prior and Informed Consent (FPIC) is not required and no ESS7-specific instruments will be prepared. Potential risks of exclusion or discrimination will be addressed through the application of ESS1 and implementation of the Stakeholder Engagement Plan (SEP), which will ensure inclusive and accessible consultations and take into account the needs of vulnerable or marginalized groups, including traditional ethnic minorities. Should future project modifications introduce activities that may adversely affect IP/SSAHUTLC, the project documents will be updated as necessary and proportionate measures under ESS7 will be applied.	Same timeframe as the SEP	FGS
ESS 8: CULTURAL HERITAGE			
8.1	CULTURAL HERITAGE RISKS AND IMPACTS	Same timeframe as for the preparation and implementation of the ESMPs.	FGS

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Consistent with the ESMF ensure that ESS8 related measures are included in the ESMPs for subprojects and that such measures are adopted and implemented in a manner acceptable to the Association.	Implement the ESMPs prepared under 1.2 throughout subproject implementation.	
8.2	CHANCE FINDS Implement Chance Finds Procedure consistent with ESS8 as part of the ESMF and in each Contractor's ESMPs.	Same timeframe as for the preparation and implementation of the ESMPs.	
ESS 9: FINANCIAL INTERMEDIARIES			
9.1	ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM (ESMS) Not relevant to the project.		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN Update and implement a Stakeholder Engagement Plan (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.	Update the SEP: the SEP for the Additional Financing will be finalized and disclosed no later than three months from the Effective Date of the Grant Agreement. It will thereafter be implemented throughout Project implementation.	FGS
10.2	PROJECT GRIEVANCE MECHANISM 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. 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.	Maintain and operate the mechanism throughout Project implementation.	FGS
INDICATORS FOR IMPLEMENTATION READINESS			
The following actions are indicators for implementation readiness: 1. Updated SEP as per 10.1			