Federal Government of Somalia

Somalia Disaster and Climate Resilience Development Policy Financing

Somalia Contingent Emergency Response Project (P509224)

FINAL

ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN

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1 Introduction

Somalia is an FCV country with a landmass of 637,657 km2. It experiences hot desert-like environmental conditions in the north and a semi-arid climate in the south. Somalia's terrain consists mainly of plateaus, plains, and highlands. The country is dominated by pastoral and agro-pastoral livelihoods, though there is some large-scale irrigated agriculture in riverine areas in the south. Along the southern coast of the country, fish-based livelihoods are practised. Disasters in Somalia, whether natural or man-made, have had profound and far-reaching impacts on vulnerable populations. Somalia endures intensifying and recurrent climate shocks, such as droughts, floods, and locust invasions, making the country one of the world's most climate-vulnerable countries. Some of the country's population is in hard-to-reach and rural areas, compounded with conflicts, displacement, poverty, and depleting natural resources, where women and girls are exposed to significant hurdles impeding their livelihoods and empowerment, including Gender Based Violence (GBV), and where minorities are discriminated in access to services.

Extreme climate events are the largest single cause of significant internal displacement and also interact with the long-running security crisis to severely strain both Somali society and the capacity of the international community's humanitarian response. Millions of Somalis have been forced to flee their homes and shelter in camps or across borders, leading to a large-scale refugee crisis and displacing families and social networks. Droughts, for instance, lead to crop failure, loss of livestock, and the subsequent severe famine and food shortage, affecting the most vulnerable population, older persons and children. In addition, the loss of agricultural/livestock production reduces incomes since these are the two key sectors in Somalia. Natural disasters in Somalia often destroy key infrastructure such as roads, bridges and hospitals. Displacement leads to poor living conditions, which, combined with limited access to health care, leads to disease outbreaks such as cholera, respiratory infections and malnutrition-related illnesses. The lack of clean water and sanitation amplifies the health risks. The effects of natural disasters in Somalia are widespread and multi-dimensional, affecting the environment and social stability.

1.1 The purpose of ESMP

This document seeks to outline the project's environmental and social risk management strategy. as the ESMP is a 'living document' that will be regularly reviewed and updated by the CERP-PIU in response to changes to the project description, organisational structure, intervention strategies and changes in legislation and any other guidelines and practices subscribed to, as well as changes in project design and local context. The overall purpose of the ESMP is to ensure smooth and effective implementation of environmental and social risk management measure, mitigation of adverse impacts and an effective monitoring plan.

The specific objectives include but are not limited to;

i. Environmental, Social ,health and safety within the surrounding environment and minimizing environmental risk during the design, construction, and operation phases of the response;
ii. To specify appropriate roles and responsibilities, and outline the necessary reporting procedures, for managing and monitoring environmental and social concerns related to the project;
iii. To provide mitigation measures against all identified and potential negative impacts resulting from the activities of the proposed development;

iv. To assign duties to various actors in the management plan for purposes of enhancing accountability in this project, and
v. Ensure that the project operates in compliance with the Somalia county legal requirements, ESMP, project operations manual(POM) and legal requirements in the management of E and S standards, policy and procedures. The ESMP also takes into account the international good practice, notably the World Bank Environmental and Social Framework, the World Bank Group Environmental Health and Safety Guidelines (EHSGs),

1.2 Alignment with World Bank Environmental and Social Standards

This subsection should explain how the ESMP aligns with the World Bank Environmental and Social Standards (ESS). It should provide an overview of the relevant ESS and describe their application to the project, ensuring compliance with the World Bank Environmental and Social Framework (ESF). This section is critical for bridging international best practices with Somali regulations and for establishing a robust approach to environmental and social risk management.

The CERP ESMP for has been prepared in alignment with the World Bank Environmental and Social Framework (ESF), which includes 10 Environmental and Social Standards (ESS). The following standards are particularly relevant to the project:

- *ESS1[1]: Assessment and Management of Environmental and Social Risks and Impacts*
  Provides a framework for identifying, assessing, and managing risks associated with project activities.
- *ESS2[2]: Labor and Working Conditions*
  Ensures safe and equitable labour practices, including protection for workers and management of labour grievances.
- *ESS3[3]: Resource Efficiency and Pollution Prevention and Management*
  Encourages sustainable resource use and pollution control to minimize environmental harm.
- *ESS4: Community Health and Safety*
  Focuses on protecting communities from risks such as construction hazards, pollution, and project-related accidents.
- *ESS7: Indigenous peoples/Sub Saharan African Historically Underserved traditional local communities.*
- *ESS10[4]: Stakeholder Engagement and Information Disclosure*
  Promotes inclusive consultation processes and access to information for all stakeholders, ensuring their concerns are addressed.

Where gaps exist between Somali regulations and WB ESS, this ESMP adopts the stricter standard to safeguard affected communities and the environment.

[1] Examples of risks may include health and safety risks for communities,.

[2] Labor requirements under the Somali Labor Code (1972) partially align with ESS2 but may require additional safeguards for worker rights.

[3] Focus on specific pollutants, such as construction dust, waste disposal, or water contamination risks

[4] Engagement strategies must be culturally appropriate and inclusive, targeting marginalized groups like women, youth, and IDPs

1.3 Structure of the ESMP

The CERP ESMP is organised in the following manner

Table 1: Structure of the ESMP

Section	***Summary***
1. Introduction	Outlines the purpose and structure of the Environmental and Social Management Plan (ESMP), highlighting its alignment with the World Bank Environmental and Social Standards.
2. Project Description	Provides a detailed overview of the project, including its objectives, scope, main components, and phases. It also describes the geographic area of influence and identifies key stakeholders and beneficiaries.
3. Legal and Institutional Framework	Summarizes the relevant national environmental and social legislation, applicable international agreements, and the World Bank's Environmental and Social Standards that govern project compliance and implementation.
4. Environmental and Social Impacts	Identifies and evaluates the potential environmental and social impacts of the project, covering physical, biophysical, and social aspects. It also includes a summary of residual impacts after mitigation.
5. Environmental and Social Management Plan	Details the mitigation measures for identified impacts, assigns responsibilities, and sets timelines. This section serves as the core operational framework for managing environmental and social risks.
6. Implementation, Monitoring & Compliance	Defines institutional roles and responsibilities for ESMP implementation and outlines procedures for environmental and social monitoring to ensure compliance and effectiveness of mitigation measures.
7. Capacity Building and Training	Describes the training objectives and strategy to enhance the capacity of implementing agencies, contractors, and stakeholders to effectively manage environmental and social aspects of the project.
8. Annex	Covers the E and S screening checklist. SEP, GM .

2 Project Description

The Contingency Emergency Response Project (CERP)

In the event of an eligible crisis and if the CERP is activated , several immediate response needs would be supported through the operation, as applicable given the nature of the crisis. This is intended to mitigate the immediate impacts of crises on vulnerable populations by aiding access to critical inputs and the resources needed for recovery. This may include emergency livelihood support / cash grants to impacted households, provision of essential / emergency services and supplies as well as support for emergency response coordination and management. Technical assistance will be provided to ensure the efficient and effective utilization of these resources, optimizing the recovery process, and enhancing the resilience of affected populations.

The proposed CERP will respond promptly and effectively to any eligible natural disaster in Somalia. The CERP will have a national geographical scope, and it will be activated in the event of an eligible crisis (drought, health outbreaks and floods) and several immediate response needs supported through the operation over 12 months, as applicable given the nature of the crisis. This is intended to mitigate the immediate impacts of crises on vulnerable populations such as women, youth, persons with disabilities (PWDs), Internally Displaced Persons (IDPs), and traditional ethnic minorities by aiding access to critical inputs (goods and/or cash) and the resources needed for recovery.

2.1.1 Project development Objectives

The project Development objective is to respond promptly and effectively to an eligible natural disaster in Somali.

The CERP will be a six-year engagement and may include multiple activations for different natural disasters5. Activation of CERP for an eligible crisis will be initiated through a formal request from the GoS, sent to the World Bank's Country Director. The Activation Request package will provide a list of host operations from which financing will be repurposed to finance the CERP with the corresponding amount to be repurposed from each host operation, a crisis response plan, evidence of the eligible emergency or crisis and payment instructions as per the Disbursement and Financial Information Letter (DFIL). The Activation Request may be based on a rapid impact and needs assessment drawing on existing reports or conducted jointly with a qualified third party and will outline urgent response priorities to be addressed through the CERP. It will list emergency activities to be financed, the budget for the activation, and specific implementation modalities and procurement details. Following the submission of the Activation Request, the World Bank will review the request according to its internal procedures. Upon approval, a notification of confirmation will be sent to the GoS. Once activated, activities supported under each CERP activation must be completed within a 12-month period. The financing repurposed for CERP will be operationally delinked from the host project, meaning all operational responsibilities will lie with the CERP, although it will remain linked to the original host project financially and legally.

2.1.2 Activities supported by the CERP

In the event of a natural disaster, notably floods and drought which are intensifying because of climate change, and if the CERP is activated6, several immediate response needs would be supported through the operation, as applicable given the nature of the crisis. This is intended to mitigate the immediate impacts of crises on vulnerable populations by aiding access to critical inputs and the resources needed for recovery. This includes providing direct food aid, emergency cash assistance, and relief supplies to households and distributing light equipment for the restoration of access and implementation of the CERP. Additionally, technical assistance will be provided by implementing partners to ensure the efficient and effective utilization of these resources, optimizing the recovery process, and enhancing the resilience of affected populations. A climate and disaster risk screening that was completed has indicated an overall low risk of

[5]Subsequent CERPs will be prepared upon the government's request, building on the lessons learned and experiences from the initial CERP.

[6] Details on the crisis activation are described in the CERP Manual

the project's activities, as they include only emergency response support with a low impact on physical infrastructure. The activities supported by the CERP include:

Emergency Livelihood Support to Households:

The CERP will provide direct emergency income support to people/ households affected by disasters by scaling cash transfers and cash-for-work programs. This will aid in stabilizing their livelihoods, smoothen consumption and enhance their ability to source food and items for basic needs. Cash transfers will be disbursed using Baxnaano program7, to ensure timely and efficient delivery. This may include a time-bound cash top-up8 to existing social cash transfer households in the priority impacted areas, and/or allow for new eligible households in the impacted districts that are already identified (through the Unified Social Registry (USR) national database of vulnerable people), developed by the Ministry of Labor and Social Affairs (MoLSA), to receive emergency cash assistance on a time-limited basis9. These activities will use biometric registration system to quickly enrol beneficiaries and synch beneficiary systems across relevant partners to streamline beneficiary lists and to avoid duplicative enrolment.

Provision of Essential Services/Supplies:

Support will be provided to sustain delivery of critical services and accessibility of supplies during and after emergencies. It will finance the procurement and distribution/delivery of necessary supplies and services to meet immediate needs of affected persons such as the provision of water and sanitation (filters, hygiene kits, etc.), distribution of food staples (grain, maize, etc.), supply of relief items (shelter kits, cook stoves, etc.), and distribution of light equipment to facilitate access (spades, shovels, etc.). Supplies may include those critical for emergency response, which may depend on the nature of the crisis.

Disasters in Somalia, whether natural or man-made, have had profound and far-reaching impacts on vulnerable populations. Somalia endures intensifying and recurrent climate shocks, such as droughts, floods, and locust invasions, making the country one of the world's most climate-vulnerable countries. Some of the country's population is in hard-to-reach and rural areas, compounded with conflicts, displacement, poverty, and depleting natural resources, where women and girls are exposed to significant hurdles impeding their livelihoods and empowerment, including Gender Based Violence (GBV), and where minorities are discriminated in access to services. Extreme climate events are the largest single cause of significant internal displacement and also interact with the long-running security crisis to severely strain both Somali society and the capacity of the international community's humanitarian response. Millions of Somalis have been forced to flee their homes and shelter in camps or across borders, leading to a large-scale refugee crisis and displacing families and social networks. Droughts, for instance, lead to crop failure, loss of livestock, and the subsequent severe famine and food shortage, affecting the most vulnerable population, older persons and children. In addition, the loss of agricultural/livestock production reduces incomes since these are the two key sectors in Somalia. Natural disasters in Somalia often destroy key infrastructure such as roads, bridges and hospitals. Displacement leads to poor living conditions, which, combined with limited access to health care, leads to disease outbreaks such as cholera, respiratory infections and malnutrition-related illnesses. The lack of clean water and sanitation amplifies the health risks.

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[7] Final preparations are underway for the government to assume full ownership of a shock-responsive social protection system, which has been under development with the support of the World Bank-financed Shock Responsive Safety Net for Human Capital Project (SNHCP; PI71346) ("*Baxnaano*"), which launched in 2019

[8] Vertical expansion of social protection

[9] Horizontal expansion

2.2 Rationale of Project

The effects of natural disasters in Somalia are widespread and multi-dimensional, affecting the environment and social stability. The proposed CERP will respond promptly and effectively to an eligible natural disaster in Somalia. The CERP will have a national geographical scope, and it will be activated in the event of an eligible crisis (drought, health outbreaks and floods) and several immediate response needs supported through the operation over 12 months, as applicable given the nature of the crisis. This is intended to mitigate the immediate impacts of crises on vulnerable populations such as women, youth, Internally Displaced Persons (IDPs), and groups that fit the ESS 7 criteria by aiding access to critical inputs (goods and/or cash) and the resources needed for recovery.

Project Beneficiaries

The direct beneficiaries of the project are the citizens of Federal Republic of Somalia. The project is national in scope, and therefore, the benefits will accrue to all citizens, encompassing a broad range of demographic and socioeconomic groups. Vulnerable groups, including women, children, the elderly, PWDs, IDPs and traditional ethnic minorities (groups that meet the ESS 7 criteria), will receive targeted support to ensure their safety and resilience during and after disasters.

3 Legal and Institutional Framework

This section provides a discussion of the policy and legal framework for the activities envisaged under the CERP.

3.1 National Regulatory and Policy Framework

Somali policy and legislation with respect to the environment is nascent or outdated. A number of international agreements exist, and although binding on Somalia, there has been little progress in the implementation of those. These international environment agreements include topics such as biodiversity, desertification, endangered species, and ozone layer protection. In recent years the Federal Republic of Somalia and its Federal Member States (FMS) have effected constitutional changes that define natural resources, common environmental goods and ecosystem services as protectable public assets and ascertain the right to a clean and healthy environment. However, there are no specific environmental or regulations in place. Protection and use of Somali water resources is the responsibility of the Ministry of Water Resources that has put a policy, act and regulatory framework in place. The Min. for Natural Resources (MNR), shall establish the Regional Watch Councils (REWC). The MNR, in consultation with the Local Government Councils/ District Governor, local Civil Society Organizations (CSO) and Community Based Organizations (CBOs) and the community shall establish the District Environment and Environment Watch Council (DEWC).

As a stop gap measure, in the absence of a national regulatory framework for sustainable environment, Somalia has a Provisional Constitution (2012) that contains a number of parameters relevant for various operational activities for the planned sub-project of the SCRP: The table below lists laws and regulations that address the key concerns of the project:

Table 2; National Regulations, Policy and application to the CERP

Policy/law	**Application to the CERP**
The Constitution of the Federal Government of Somalia	The Provisional Constitution establishes fundamental rights and freedoms for Somali citizens, ensuring equality and protecting vulnerable populations from forced labor and other abuses. It also includes provisions for environmental safeguards, affirming the right to a healthy and sustainable environment. The Constitution acts as the cornerstone for environmental and social governance in the country, laying the legal foundation for subsequent regulations.
Occupational health and safety standards (OHS) (Art. 101	The employer is obligated to provide adequate measures for health & safety protecting staff against related risks, including the provisions of a safe and clean work environment and of well-equipped, constructed and managed workplaces that provide sanitary facilities, water and other basic tools and appliances ensuring workers' health and safety.
The Somali Penal Code of 1962	Criminalizes rape and other forms of sexual violence as well as forced prostitution. Articles 398-9 provide that 'carnal intercourse' and 'acts of lust omitted with violence' are punishable with 5-15 years and 1-5 years of

	imprisonment. Abduction for the purpose of lust or marriage is prohibited under Art 401.
Somalia National Gender Policy (2016)	Includes strategies to eradicate harmful traditional practices such as FGM/C and child marriage and to improve services for the management of GBV cases.
Article 12 addresses public assets and natural resources; Art.	i) Provides that all citizens have equal rights regardless of sex, and that the State must not discriminate against any person on the basis of gender; ii) Article 14 stipulates that a person may not be subjected to slavery, servitude, trafficking, or forced labor for any purpose; iii) The Labor Code stipulates the right to equal pay for the same work as men, paid maternity leave. Women are entitled to 14 weeks of maternity leave at half pay.
Art 24	Prohibits sexual abuse in the workplace; Article 24.5 stipulated that all workers, particularly women, have a special right of protection from sexual abuse, segregation and discrimination in the workplace. Every labor law and practice shall comply with gender equality in the workplace.
Article 25	States that every Somali has the right to an environment that is not harmful to them, and to be protected from pollution and harmful materials. Every Somali has a right to have a share of the natural resources of the country, whilst being protected from excessive and damaging exploitation of natural resources.
Article 45	States that the Government shall give priority to the protection, conservation, and preservation of the environment against anything that may cause harm to natural biodiversity and the ecosystem. Furthermore, all people have a duty to safeguard and enhance the environment and participate in the development, execution, management, conservation and protection of the natural resources and the environment. The FGS and the governments of the FMS affected by environmental damage shall take urgent measures to clean up hazardous waste dumped on the land or in the waters of the FGS; take necessary measures to reverse desertification, deforestation and environmental degradation, and to conserve the environment and prevent activities that damage the natural resources and the environment of the nation, among other measures.
The National Environmental Policy (2019)	However, the implementation of this policy has not been rolled out in South West State. In regard to the institutional capacity for environmental management, a Directorate of Environment is integrated in the Office of the Prime Minister. It is mandated to draft relevant policies and legislation, including establishing Environmental Quality Standards, and Sectoral Environmental Assessments, Environmental Impact Assessments (EIA). Laws on environmental governance in South West State are in the infancy stages and environmental impact assessment capacity is nascent. Environmental decision-making arrangements includes the FGS signing international conventions, and parliament approving Environmental Acts and Laws. However, necessary laws have not been formulated yet.

ILO Convention 182 on Worst Forms of Child Labor	Ratification of this Convention makes a country commit itself to taking immediate action to prohibit and eliminate the worst forms of child labor. Some predefined worst forms of child labor include sale of a child, trafficking of children, forced or compulsory labor, commercial exploitation of children, prostitution or the production of pornography, and work by its nature that is likely to harm the health, safety and morals of children. The Convention was ratified by Somalia in 2014. The Labor Code further forbids work for children below the age of 12 but allows employment of children between the age of 12-15, yet employment has to be compatible with proper protection, health and the morals of children. The Code also recognizes freedom of association. Employers are prohibited from engaging in any kind of discrimination or restriction of the right of freedom of association. Workers are allowed to join trade unions.
The Labour Code of 19724 (Art. 31-42)	Stipulates that all contracts of employment must include a) the nature and duration of the contract; b) the hours and place of work; c) the remuneration payable to the worker; and c) the procedure for suspension or termination of the contract. Furthermore, all contracts must be submitted to the competent labor inspector for pre-approval. (Art. 134-140) further stipulates that workers have the right to submit complaints, and the employer must give the complaints due consideration. Remuneration must be adequate in view of the quality and quantity of the work delivered, and must be non-discriminatory in regard to age, gender and other aspects. The maximum number of working hours per week are 8 hours per day and 6 days per week. Some work is considered dangerous and unhealthy and forbidden for women and youth (defined as 15-18 years of age). This includes carrying heavy weight or working at night.
International Conventions Signed and Ratified by Somalia The 1992 United Nations Framework Convention on Climate Change (1992). The Convention was adopted in 1992 and came into force in 1994. Somalia acceded to the Convention in 2009. Somalia ratified the Kyoto agreement in 2010 and the Paris agreement in 2016	The primary purpose of the Convention is to establish methods to minimize global warming and in particular the emission of greenhouse gases. The convention aims to protect endangered plants and animals. Somalia signed the Convention in 1985 and ratified it in 1986. Its current status is that of accession.
Forced Labour Convention (1930/no. 29).	The key objective of the Convention is to suppress the use of forced labor in all its forms. It defines forced labor as 'all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily.

3.2 World Bank Environmental and Social Standards (ESS)

The Environmental and Social Framework (ESF) sets out the World Bank's commitment to sustainable development, through a Bank Policy and a set of Environmental and Social Standards. Below is a short summary of the relevant Environmental and Social Standards (ESSs).

Table 3: WB- Environmental and Social Standards

Policy/law	Objective	Application to the CERP
ESS 1: Assessment and Management of Environmental and Social Risks and Impacts.	Sets out the Client's responsibilities for assessing, managing and monitoring environmental and social risks and impacts associated with each stage of the project.	This ESS is relevant to this sub-project, and E&S risks and impacts are managed through this ESMP.
ESS 2 – Labor and Working Conditions.	To ensure the safety of workers, protection of the Borrowers can promote sound worker-management relationships and enhance the development benefits of a project by treating workers in the project fairly and providing safe and healthy working conditions.	ESS2 recognizes the importance of employment creation and income generation in the pursuit of poverty reduction and inclusive economic growth. ESS2 applies to project workers including full-time, part-time, temporary, seasonal and migrant workers. In order to mitigate risks and impacts in relation to labor and working conditions, the SCRP has prepared Labor Management Procedures (LMP), which are annexed to the ESMF.6 This ESMP lists the relevant procedures.
ESS 3 – Recourse and Efficiency, Pollution Prevention and Management.	This ESS sets out the requirements to address resource efficiency and pollution prevention and management throughout the project life cycle consistent	This standard recognizes that economic activity and urbanization often generate pollution to air, water, and land, and consume finite resources that may threaten people, ecosystem services and the environment at the local, regional, and global levels. The current and projected atmospheric concentration of greenhouse gasses (GHG) threatens the welfare of current and future generations. At the same time, more efficient and effective resource use, pollution prevention and GHG emission avoidance, and mitigation technologies and practices have become more accessible and achievable.
ESS 4 – Community Health and Safety.	To minimize the extent that project activities, equipment, and infrastructure can increase community exposure to risks and impacts.	Key risks and impacts of the sub-project in regard to community health and safety relate to GBV/SEA-H, pollution and security. This standard also provides for an assessment for Gender Based violence (GBV) and particularly the two forms regarding Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) and offers a robust response to SEA/SH through a comprehensive GBV/SEA-H action plan. Consistent with this, the ESS4

		addresses the health, safety, and security risks and impacts on project-affected communities and the corresponding responsibility to avoid or minimize such risks and impacts, with particular attention to people who, because of their particular circumstances, may be vulnerable. **Security Management shall reflect:** project implementation in fragile and conflict-affected areas, with risk mitigation measures related to site security and staff safety This security management plan shall cover Community Health and Safety on Personnel Security in line with the World Bank Good Practice Note on Assessing and Managing Risks and Impacts of the Use of Security and the Guidelines for Implementation of the UN Basic Principles on the Use of Force and Firearms by law Enforcement Officials. The standard role of public security will be to maintain the rule of law, including safeguarding human rights and deterring act that threaten the project personnel and facilities. The public security forces to be deployed shall be competent, appropriate and proportional to the threat.
ESS 7: Indigenous peoples/Sub Saharan African Historically Underserved traditional local communities.	To ensure their participation and minimize the impact of project interventions in their lives.	This ESS ensures that there is a minimized impact of the projects activities in their lives. Some of the traditional local communities in Somalia meet the criteria under ESS 7 necessitating the need for clear and strategic interventions that ensure that their unique needs in society are protected.
ESS 10 – Stakeholder Engagement and Information Disclosure.	Promote effective management of E and S risks and also ensure buy in of project activities.	Stakeholder engagement has been undertaken for this sub-project, the standard ensures adequate identification of the stakeholders, information requirements and further enhances the projects capacity to ensure buy in of project strategies which will ensure sustainability.

3.3 WBG Environmental, Health and Safety (EHS) Guidelines and Technical Notes

The subproject will apply the WBG General EHS Guidelines from 2007, including the EHS guidelines for Toll Roads. These guidelines contain the performance levels and measures that are acceptable to the WB. When the national regulation differs from the levels and measures presented in these guidelines, the subproject will be required to achieve whichever is more stringent.

The following Good Practice Notes will also be consulted to ensure that mitigation measures developed are aligned with best industry practices : Addressing sexual exploitation and abuse and sexual harassment (SEA/SH) in investment projects financing involving in major civil works, 2020; Addressing Gender based violence in Investment Project Financing involving major civil works, 2018; Road safety, 2019; Assessing and managing the risks and impacts of the use of security personnel, 2018; Managing the risks of adverse impacts on communities from temporary project induced labor influx, 2016. The Technical Note produced by the WB following the pandemic "Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints of conducting public meetings" (2020), will also be used as a reference.

4 Environmental and Social Impacts and mitigation measures

This Section describes the supplemental E&S measures that will need be implemented in addition to the national requirements. Mitigation measures will be based on national requirements, supplemented where necessary by the measures described below. In implementing the activities, it is acknowledged and agreed that the emergency nature of the activities means that priority will be given to the need for urgent interventions and the protection of people and assets most affected by the emergency. For all activities, the risks of exclusion for different groups and individuals will be considered, so that the activity is implemented in as fair, equitable and inclusive manner as possible.

Identified mitigation measures are based on national legislation, the relevant ESS as well as the World Bank Group Environmental, Health and Safety Guidelines (EHSG).

Indicative Positive List of Activities

Table 4: Indicative positive list of activities

Tier 1: Activities to be financed under Tier 1
Emergency Livelihood Support to Households • Direct emergency income support to households through cash transfers to address multi-sectoral needs while enabling local needs
Provision of Essential Services and Supplied for Emergency Response • Acquisition of water supplies (water purification tablets[1]; water trucking, water storage bladders, sachets of oral rehydration salts; portable water filters; mobile water treatment units) to support crisis affected populations. • Acquisition of essential supplies such bailey bridges, tents, sleeping bags, personal hygiene kits, household kits etc. • Purchase of light equipment for the restoration of access and implementation of CERP including hand tools such as spades, shovels, hoes, and wheelbarrows. Heavy machinery, such as bulldozers or tipper trucks may be rented for debris removal. • The purchase of green cook stoves and generators. • Procurement of pharmaceuticals, medicine, medical supplies (excluding chlorine), and critical medical equipment such as crash carts, infusion pumps and Oxygen supply, personal protective equipment (PPE) and various diagnostic tools which exclude any equipment containing radioactive materials. • Procurement of specialized nutrition supplements, such as high energy biscuits, Ready-to Use Therapeutic Food, Ready-to-Use Supplementary Food, etc. • Hiring and deployment of rapid response teams of health workers with appropriate emergency medical kits. • Emergency Livestock Protection Kit - a highly targeted livestock health package specifically for pastoral households facing acute crisis, focused only on preserving core breeding stock during emergency periods.

Emergency Response Coordination and Management

- Financing for surge of responders and repair crews, excluding law enforcement officials.
- Shelter administrative support and essential goods to support shelter operations (covers the administrative aspects of shelter operations, including the payment of salaries for shelter managers and personnel responsible for overseeing the functioning of shelters. It also includes the acquisition of essential goods necessary for shelter administration, such as office supplies and basic furniture (e.g., tables, chairs, cots etc.). Direct operation of shelters, including activities such as camp establishment, land agreements and compensation, and the provision of sanitation and waste management services, is not included).
- Additional transportation costs (i.e. use of other transportation), increased electricity bills for the public sector, staff overtime and Funding for technical assistance including international and local specialized expertise (consultancy) to support recovery and provide just-in-time technical assistance and preparation of technical documents for procurement.
- Incremental Emergency Response Operational Administrative Costs.
- Financing implementation of E&S instruments.
- Audit costs (financial and technical).

For each of the Activities, the following potential risks and impacts have been identified, and supplemental mitigation measures include the following:

Table 5: E and S risks and Impacts and supplemental mitigation measures

ACTIVITY/GENERAL ISSUES	Risks and Impacts	SUPPLEMENTAL MITIGATION MEASURES
Cash transfers to households.	The cash transfers will follow established procedures from the Social Support for Resilient Livelihoods Projects (SSRLP), which includes the identification and servicing of vulnerable groups. - Risk of exclusion of beneficiaries, especially from vulnerable groups -women, youth, IDPs, PWDs and ethnic minorities.	- Implementation of SSRLP procedures for cash distribution (see CERP Manual). - Implementation of stakeholder engagement as per the SEP. - Operate an effective Grievance Mechanism (GM).
Acquisition of food staples (maize, grain etc.…)	The acquisition of food staples focuses on the procurement of food items by either selected government agencies, UN agencies or other implementers. It will not include storage or distribution. - Labor-related risks, labour conditions among suppliers. - Traffic related risks during transport of goods - Downstream risks of waste production through packaging.	- Identify procurement procedure to ensure rapid purchase of required quantities of food and water. - Where possible, execute agreements for specific volumes. - Implement Traffic Management Framework (Annex 7). - Comply with Labor Management Procedure (Annex 2). - Implement General Waste Management Framework (see Annex 5).
Procurement of pharmaceuticals, medicine, medical supplies (excluding chlorine), medical equipment such as ventilators, personal protective equipment (PPE), and various diagnostic tools that exclude any equipment containing radioactive materials.	The types of medicine or medical equipment are unknown at this point. The activity will likely be implemented through or in coordination with the Ministry of Health. It may be implemented by governmental agencies, UN agencies or other implementers. The activities will only include procurement, but no storage or distribution of the medicines and supplies. - Labor-related risks, labor conditions among suppliers. - Downstream risks related to medical waste production. - Traffic related risks during transport of goods.	- Identify procurement procedure to ensure rapid purchase of required quantities of medicine. Where possible, execute agreements for specific volumes. - Pre-purchase (where feasible) medicine. - Ensure medicine is stored in accordance with the manufacturer's specifications, including temperature controls, humidity controls, security measures, proper shelving and labelling. - Ensure only licensed entities transport or store medicines. Vehicles used for transporting medicines must meet specific standards, including cold chain management and documentation. - Implement LMP (see Annex 2). - Implement Traffic Management Framework (see Annex 7). - Ensure that all medicine to be procured complies with relevant technical specifications, including manufacturers requirements, relevant WHO guidelines and GIIP. - Implement medical waste management framework (Annex 5).

Acquisition of veterinary medicine and supplies including animal first aid kits, medicine, vaccines and medical supplies.	The types of medicine or medical equipment are unknown at this point. The activity will likely be implemented through or in coordination with the Ministry of Agriculture, specifically the Department of Animal Health and Livestock Development. It may be implemented by governmental agencies, UN agencies or other implementers. The activities will only include procurement, but no storage or distribution of the medicines and supplies. - Labor-related risks, labor conditions among suppliers. - Downstream risks related to medical waste production. - Traffic related risks during transport of goods.	- Identify procurement procedure to ensure rapid purchase of required quantities of veterinary medicine. Where possible, execute agreements for specific volumes. - Prepurchase (where feasible) medicine. - Ensure medicine is stored in accordance with the manufacturer's specifications, including temperature controls, humidity controls, security measures, proper shelving and labelling. - Vehicles used for transporting medicines must meet specific standards, including cold. - Implement medical waste management framework (Annex 5). - Implement LMP (see Annex 2). - Implement Traffic Management Framework (see Annex 7).
Purchase of agricultural inputs, such as seeds, livestock feed.	The activity will likely be implemented through or in coordination with the Ministry of Agriculture, a UN agency or other implementers. The activities will only include procurement, but no storage or distribution of goods. - Labor-related risks, labor conditions among suppliers - Downstream health & safety risks related to agricultural inputs - Traffic related risks during transport of goods	- Implement LMP (see Annex 2) - Implement Traffic Management Framework (see Annex 7) - Implement Health & Safety Framework (see Annex 3)
Acquisition of essential supplies such as bailey bridges, tents, sleeping bags, personal hygiene kits, household kits etc. Rental of light equipment for removal of access and implementation of the CERP (e.g. removal of boulders and debris). Light equipment includes shovels, spades, or generators. Purchase of green cook stoves.	The activity will likely be implemented through a governmental agency, a UN agency or other implementers. The activities will only include procurement, but no distribution of goods, and no installation of bailey bridges. - Labor-related risks, labor conditions among suppliers. - Traffic related risks during transport of goods.	- Implement LMP (see Annex 2). - Implement Traffic Management Framework (see Annex 7).
Shelter administration, including, acquisition of goods necessary for shelter operation administration.	- Risks in relation to labor management and conditions. - Risks related to OHS for surge and repair crews.	- Implement LMP (Annex 7). - Implement Health & Safety Framework (see Annex 3).
Evacuation procedures	- Risk of exclusion of vulnerable groups during evacuation.	- Provide all necessary information tailored to vulnerable groups, as per the SEP.

Shelter administrative support and essential goods to support shelter operations (covers the administrative aspects of shelter operations, including the payment of salaries for shelter managers and personnel responsible for overseeing the functioning of shelters. It also includes the acquisition of essential goods necessary for shelter administration, such as office supplies and basic furniture (e.g., tables, chairs, cots etc.).	The activity will likely be implemented through a governmental agency, a UN agency or other implementers. The activities will only include procurement of goods or payment of salaries. - Labor-related risks, labor conditions among suppliers and workers. - Traffic related risks during transport of goods.	
Additional transportation costs (i.e. use of other transportation), increased electricity bills for the public sector, staff overtime and Funding for technical assistance including international and local specialized expertise (consultancy) to support recovery and provide just-in-time technical assistance and preparation of technical documents for procurement.	The activity will likely be implemented through a governmental agency, a UN agency or other implementers. Technical assistance does not include any substantive products with downstream E&S risks and impacts. - Labor-related risks, labor conditions among workers. - Traffic-related risks during transport funded.	- Implement LMP (Annex 2). - Implement Traffic Management Framework (see Annex 7).

Negative List

The following goods, services or activities are prohibited under this Project:

a) Procurement of goods and services through security forces (including but not limited to Defence Force, Police Force, Forestry Officers, Wildlife Officers and Rangers, etc.), Staff overtime payments for members of security forces (as per the above). Use of prison labor, child labor, or forced labor.

b) Any civil works, including, but not limited to boreholes, water supply schemes, irrigation schemes, temporary road repairs/refurbishments of infrastructure and buildings and storage facilities.

c) Installation of bailey bridges, Construction or refurbishment of storage facilities.

d) Activities involving land acquisition, restrictions on land use or resettlement (both temporary and permanent).

e) Direct operation of shelters, including activities such as camp establishment, land agreements and compensation, and the provision of sanitation and waste management services.

f) Activities in protected and sensitive areas including riverbanks, key biodiversity areas, and critical habitat. Activities in known national or internationally recognized cultural heritage sites.

g) Any activities requiring site specific environmental and social risk and/ or impact assessment, Sanitary waste management. Procurement, storage, or distribution of goods with chlorine or other hazardous substances.

h) Procurement, storage, or distribution of fuel, medicine and veterinary medicine.

i) Production or trade in any product or activity deemed illegal under host country laws or regulations or international conventions and agreements, or subject to international bans, such as pharmaceuticals, pesticides/herbicides, ozone depleting substances, PCB's, wildlife or products regulated under CITES.

j) Production or trade in weapons and munitions, alcoholic beverages, tobacco, gambling, casinos and similar enterprises.

k) . Production or trade in radioactive materials. This does not apply to the purchase of medical equipment, quality control (measurement) equipment and any equipment where the Association considers the radioactive source to be trivial and/or adequately shielded.

5 Environmental and Social Management and Monitoring Plan

This ESMP sets out the mitigation measures that will be implemented for the activities. It is recognized that this ESMP cannot specify all details of the activities that will be required by the Government in the event of an emergency response. Once the CERP has been activated, the Implementing Agency will commence implementation of the activity. The Implementing Agency will screen the activity to confirm that key environmental and social risks and impacts will be mitigated in accordance with the Frameworks included in this ESMP. The following table below lays out the specific adverse risks and impacts anticipated for the project, lays out the respective mitigation measures required to reduce or eliminate the projected project impacts. This matrix forms the core of the ESMP, since it shows exactly what must be done and by whom.

Table 6: Environment and Social management plan

WB/ESF		E & S Risks and Impacts	Mitigation Measures	Responsibility	Budget for Mitigation	Monitoring Indicators	Monitoring Frequency
ESS1: Assessment and Management of Environmental and Social risks and Impacts							
		Inadequate screening for risks under the project.	Development of a robust E and S screening guide.	CERP-PIU	Part of the CERP budget	Development of a robust E and S screening tool.	Before Appraisal.
		Minimised access by beneficiaries for meaningful stakeholder consultations, community engagements and little or no access to GMs due to physical location. Flooding & drought leading to poor communication and access to services.	Implement SEP and robust GM.	CERP PIU	Part of CERP budget	# of Stakeholder engagements held. # of GM cases filed and resolved. # of issues/grievances forward to other GMs.	Before appraisal and throughout the project implementation.
		Capacity to implement the ESMP's mitigation measures against negative impacts.	Training on ESMP mitigation measures according to the different cadres of stakeholders. Raise awareness of ESMP measures to all stakeholders.	CERP-PIU	Part of CERP budget	# of H&S Training sessions. # of awareness raising sessions. Time taken to respond to emergency.	After CERP approval.
ESS 2: Labour and Working Conditions							

	Risk of insecurity of all project workers.	Project Implementation unit (PIU) to assess the security risks and put in place mitigation/management measures.	CERP-PIU	Part of CERP budget.	A comprehensive security risk assessment undertaken.	Prior to commencement of activities..
	Child labour/Forced labour	Develop and adopt effective labour management procedures (LMPs), as well as measures that ensure labourers/workers are registered with their national Identification Cards to ensure monitoring of age.	CERP-PIU	Part of CERP budget	All workers registered. Ensure that child labour policy is shared, and implementers trained on child protection aspects.	Prior to commencement of activities.
	Risk that labour and working conditions of all the workers during the emergency will not comply with WB,	Implement and monitor the LMP Listing of all staff and titles, new hires and departure. Site visits and review of records ensuring compliance with the LMP.	CERP PIU	Part of CERP budget	Employee register.	**M**onthly.
	OHS risks, including impacts of dust, noise, vibration, hot work, site traffic, ergonomics, extreme temperatures, communicable diseases.	Provide hearing protection where necessary. Use of acoustic insulating materials, isolation of noise source, and other engineering controls. Provide temporary shelters to protect against the elements during working activities or for use as rest areas.	CERP PIU	Part of CERP budget	Baselines determined before intervention.	Monthly.

		Training and licensing of industrial vehicle operators in the safe operation of vehicles and other relevant machinery. Ensure workers undergo medical surveillance and baseline health conditions determined. Establish rights of way, site speed limits, vehicle inspection requirement, SOPs for operation machineries and vehicles. Use of mechanical assistance to eliminate or reduce exertions required to lift materials, hold tools and work objects. Implement quality control and maintenance programs that reduce unnecessary forces and exertions.				
ESS 3: Resource Efficiency and Pollution Prevention and Management						
	Impacts of generation of solid waste.	Ensure disposal of generated solid waste at designated and authorized disposal site consistence with the local and international requirements (see WBG General EHS Guidelines)15, such as:	CERP PIU	Part of CERP budget	# of records of the amount of solid waste disposed, where and when. # of grievances filed.	Monthly.

		Substitute raw materials or inputs with less hazardous or toxic materials. Institute good housekeeping and operating practices – including inventory control to reduce the amount of waste. Institute procurement measures that recognize opportunities to return usable materials. Implement stringent waste segregation to prevent mixing hazardous and non-hazardous waste. Identify potentially recyclable materials Disposal at permitted facilities specially designed to receive waste Provide on-site or off-site transportation of waste to prevent or minimize spills, releases and exposure to employees and public. Ensure mechanisms exist for community to bring forth any complaints/feedback concerning the waste disposal by the contractor – Project GM.				

		Carry out disposal of solid waste in a manner that does not negatively affect the drinking water sources, cultivation fields, irrigation channels, natural drainage paths, wetlands and critical habitat, the existing waste management system in the area, local routes, and general aesthetic value of the area.				
ESS 4: Community Health and Safety						
	Risk increase of GBV/SEA/SH incidences arising out of the asymmetrical balance of power occasioned by project activities.	• Implementation and monitoring of GBV/SEAH management measures. • Dedicated GBV specialist to monitor and manage the implementation of SEA/SH measures. • Ensure all workers sign and understand the CoC, child policy, whistle blower policy etc.,	CERP PIU	Part of CERP budget	% of workers that have signed the Code of Conduct (CoC). SEA/SH management measures effectively implemented.	Monthly and quarterly reports.
	Risk of spread of communicable diseases (e.g. STIs/HIV/AIDS; Water borne diseases, etc.),	• Community awareness and training on prevention measures and management of communicable diseases. Provide hand washing stations for workers.	CERP PIU	Part of CERP budget	• Implementation of HIV/AIDS prevention measures. • All workers and communities/beneficiaries have access to information on HIV/AIDS & STIs.	Monthly.

		Provide mosquito nets for workers. Ensure usage of latrines by workers (male and female.) Contractor to ensure workers have access to face masks and sanitizers.			• % of sites with access to water points that are clean and portable.	
	Risk of exposure of community members to physical hazards on project sites.	Undertake safety precautions to address safety hazards for the nearby community. Locked storage of hazardous materials.	CERP PIU	Part of CERP budget	# outreaches and sensitisation measures for communities.	Before commencement of activities.
	Road traffic safety risks and increased noise level from increase in traffic.	Install signage for speed control in front of settlements. Safety/warning signage, safety barrier.	CERP PIU	Part of CERP budget	# of speed control signage. # of safety/warning signs have been installed.	Throughout the project implementation.
ESS7: addresses the environmental and social impacts on indigenous peoples and traditional local communities, recognizing their unique cultural, social, and economic systems						
	The CERP interventions will likely be implemented in areas inhabited by groups with distinct social and cultural characteristics, also known as Traditional Ethnic Minorities (TEMs) in Somalia. These groups are more susceptible to the impacts of natural disasters, and unless the project puts in place	Consult ESS 7 groups in a culturally appropriate and gender and inter-generationally-inclusive manner, as well as the use of differentiated/targeted approaches to engage TEMs, enabling their effective participation and access to project	CERP-PIU	Part of CERP budget	Implement the measures highlighted in the Stakeholder Engagement Plan (SEP). The CERP shall continuously monitor and report on the implementation of CERP activities in areas where these groups are present, including the nature of interventions and	Throughout the projects implementation.

	appropriate mitigation measures, they are likely to be excluded from accessing emergency response support due to a non-inclusive Crisis Response Plan meant to define beneficiaries of CERP interventions, inadequate engagement, and project investments rolled out in a context of limited resources against widespread need, elite capture, disability, literacy, and mobility challenges.	benefits and opportunities. Ensure the Crisis Response Plan inclusively defines ESS 7 groups and adheres to the Crisis Response Plan when selecting beneficiaries.			the percentage of those accessing project interventions.	
ESS 10: Stakeholder Engagement and Information Disclosure						
	Risks of poor access to beneficiaries may lead to less meaningful community engagements, monitoring for social harm thus allowing for quick response to issues and grievances. Diminished accountability and ability to response to issues in a timely manner.	Implement the SEP. Implement the GM. Create awareness.	CERP PIU	Part of CERP budget	The nature of complaints registered. % of complaints that have been addressed as well as those still open. The number of stakeholder engagement sessions held and the signed list of participants. % of disadvantaged groups, that have been included in the stakeholder engagement process.	Monthly and quarterly reports and as stipulated in the SEP and ESCP.

5.1 Implementation Budget

This section outlines the budget required by the Project Management Unit (PMU) or the Implementing Agency to carry out environmental and social monitoring, oversight, reporting, training, and safeguards oversight throughout the implementation of the project

It is essential to note that the direct costs of the ESMP mitigation measures, including dust suppression, waste disposal, safety enforcement, and site-level grievance handling, shall be fully included in the Contractor's Bill of Quantities (BoQ) and the main works contract. The Contractor shall be contractually bound to carry out all mitigation measures as per the ESMP, including subcontractor performance and reporting.

Table 7: ESMP oversight and Monitoring Plan

Component	Activity Description	Unit Cost (USD)	Quantity / Frequency	Estimated Total (USD)	Responsible Entity
Environmental Monitoring	Procurement or rental of portable air quality, noise, and vibration monitoring devices	10,000 USD	3	USD 30,000.00	PIU / Environmental Officer
	Independent environmental sampling and laboratory analysis (e.g., water, soil)	USD 80000	2	USD 16000	PIU / Contracted Lab
	Third-party environmental audit (compliance review)	USD 75,000	2	USD 150,000.00	PIU / Independent Auditor
Social Monitoring & Community Engagement	Community consultations and stakeholder meetings (venue, refreshments, facilitation)	USD 5000.00	5	SEP covered	PIU / Social Specialist
	Public disclosure and awareness materials (e.g., printed posters, translation, media)	USD 5000.00	2	SEP covered	PIU / Social Specialist
	Oversight of Grievance Mechanism (GM) – hotline, logs, grievance audits	USD 2500.00	10	SEP covered	PIU / Social Specialist
Capacity Building	Training for PMU, municipal officials, and environmental/social officers	USD 2000	4	SEP covered	PIU / Social Specialist
E&S Supervision	Staff time for E&S monitoring (PIU field visits, documentation, travel)	USD 2,000	10	SEP covered	Environmental and Social Specialists
	Field transport and logistics for safeguard	USD 10,000.00	12	SEP covered	PIU

Component	Activity Description	Unit Cost (USD)	Quantity / Frequency	Estimated Total (USD)	Responsible Entity
	supervision (vehicle hire, fuel)				
Total				196,000	

6 Consultation and Disclosure

The Government discloses the ESMP and also ensures that a robust stakeholder engagement and consultation has been done, including on the mitigation measures that may be implemented and the existence of a grievance mechanism. It is acknowledged that in an emergency situation, it may not be possible to conduct stakeholder engagement on a specific Activity as the priority is to provide an effective and rapid response. The Implementing Agency will communicate the nature of the Activities to relevant government agencies (for example, the local government, office of health, labor office), affected people and key stakeholders and, where possible, enlist their assistance and support to implement the Activities. The Implementing Agency will also engage with relevant affected people and stakeholders so that they are aware of the grievance mechanism and how it operates. For activities related to cash transfers and health existing Project SEPs will be utilized to guide the stakeholder engagement activities (e.g. identification of relevant stakeholders) that can be reasonably undertaken within the available timelines.

7 Institutional Arrangements and Resources

This section describes the institutional arrangements and resources that have been established to support this project and conduct the Activities.
The project will be led by the Ministry of Finance (MoF), which will coordinate across relevant Ministries, Departments and Agencies (MDAs) and chair the Project Steering Committee (PSC), which will provide strategic oversight and governance of the project, including approval of response budgets and the emergency action plan. The PSC will include representatives of key stakeholders, such as the Ministry of Finance, Ministry of Local Government, Unity and Culture, Ministry of Water and Sanitation, Ministry of Health, Ministry of Agriculture, the Department of Disaster Management Affairs and other key entities. The committee will also provide a platform for developing a more strategic and systematic approach to emergency response, clarifying roles and responsibility in alignment with national policies on disaster management and climate resilience, as well as for addressing stakeholders' concerns.

Project implementation will be delegated to an already established Project Implementation Unit (PIU) to be designated by the SCERP PIU. The SCERP PIU will be responsible for procurement, financial management, monitoring, reporting and evaluation, and ensuring environmental and social compliance. The following PIUs are proposed for consideration as the CERP PIU: The National Local government Finance Committee (NLGFC) PIU, which manages the Social Support for Resilient Livelihoods Project (SSRL) and Governance to Enable Service Delivery Project (GESD)/ Regional Climate Resilience Program 2 (RCRP 2); the Federal Republic of Somalia Watershed Services Improvement Project (MWASIP) and the Federal Republic of Somalia Resilience and Disaster Risk Management Project (MRDRMP) PIU, an established unit with strong Disaster Risk Management capacity; and the AgCOM PIU.

The CERP PIU will be aided with technical support from sectoral agencies such as agriculture, health, social protection, and others based on the nature of crisis and planned response, through crisis relevant Emergency Response Technical Committees (ERTCs). The ERTCs will bring together the relevant technical and procurement expertise to support the CERP PIU in conducting the activities as needed for each crisis response.

The implementation arrangements are expected to be flexible enough to adapt to unforeseen circumstances. Depending on the exact type of emergency and activities, the E&S obligations will be implemented through the available E&S staff in the respective PIU with considerations of additional consultant E&S expertise. Depending on the activities, specialized expertise regarding human or veterinarian medicine may need to be recruited. Respective UN, NGOs or other implementing partner will be expected to recruit appropriate E&S Specialists for project implementation.

8 Capacity Building and Training

In this section, an outline of the capacity building and training plan to ensure all the staff and appropriate personnel involved in the project, including CERP-PIU, the Sub-projects PIU, E and S personnel involved in the project are equipped with skills, knowledge, and equipment needed to properly execute and monitor the implementation of the ESMP.

Taking into account the fact that the 'emergency' nature of the project may necessitate a high degree of skill and efficiency in the identification and implementation of environmental and social safeguards, the project will ensure that;

- Site workers and supervisors, temporary workers and sub-contractors; Community liaison and sub-contractors and ESHS officers are adequately trained.

The implementation of this ESMP is highly dependent on the capacity and awareness of the contractors' staff, the surrounding community and the concerned stakeholders.

Training workshops are required to increase the awareness of all individuals concerned with the subproject and to train and follow up with the workers who are specifically involved in the site operation.

8.1 Training Objectives:

- Facilitate consistent application and understanding of ESMP mitigation measures.
- Promote workers' health and safety, especially while conducting high-risk urban construction activities.
- Improve the handling of grievances and community relations.
- Improve monitoring, reporting, and emergency response.
- Enhance the ability of local authorities and leaders to supervise and participate in project safeguards.

8.2 Training Strategy and Approach

The project intends to enhance capacity of the service providers at site levels by ensuring that they are able to observe simple safeguards procedures like the following:

a) On-site practical sessions (e.g., PPE use, hazardous material handling

b) Toolbox kit talks (short daily sessions on site specific risks

c) Regulatory frameworks, grievance mechanisms

The training approach will therefore involve face to face sessions with skilled personnel and other E and S operatives. The table below, highlights the stakeholder group and training focus.

Table 8: Target groups

Stakeholder Group	Training Focus
PIU and PMU Environmental & Social Specialists	WB ESS requirements, ESMP implementation and monitoring, reporting, stakeholder engagement
Contractors/sub-contractors and Site Supervisors	OHS standards, environmental controls, GM, GBV/SEA risk mitigation, reporting
Workers (including casual labor)	Code of Conduct, GBV/SEA awareness, waste handling, grievance procedures
Community Liaison Officers	Community engagement techniques, inclusive communication, GM management
Local Authorities (District/Regional)	Environmental regulations, land use impacts, construction oversight

Table 9: Capacity building and training plan

Target Group	Training Topic	Objectives	Delivery Method	Frequency	Responsible Party
Contractor Staff & Subcontractors	ESMP roles and responsibilities	Ensure all workers understand how their duties relate to the ESMP.	On-site induction training	Upon mobilization	Contractor HSE Officer
	Site-specific mitigation measures	Prevent environmental	Toolbox talks	Weekly refresher sessions	Environmental & Social Officer

Target Group	Training Topic	Objectives	Delivery Method	Frequency	Responsible Party
		and safety incidents.			
	Emergency response protocols	Set up effective emergency response	Onsite training	Upon mobilisation	Emergency response Expert
Workers (including unskilled labor)	Use of PPE and occupational safety	Protect worker health and prevent accidents.	Demonstrations	Daily toolbox talks	Site Supervisor
	Dust and noise mitigation	Ensure compliance with national labor safety standards.	Peer learning	Monthly safety workshops	Health & Safety Officer
	Waste segregation practices		Posters in Somali language		
Environmental & Social Team	Environmental & Social Monitoring	Strengthen field monitoring and documentation practices.	Workshop-based training	Quarterly	Environmental and social Consultant
	Reporting protocols	Build capacity for data-driven decision-making.	Field mentoring	Before key project milestones	Independent Safeguards Auditor
	Corrective action planning				
Community Liaison Officers / Local Elders	GM process and community engagement	Improve community trust.	Community workshops	Bi-monthly	Social Safeguards Specialist
	Conflict-sensitive communication	Ensure grievances are resolved transparently and on time.	Joint field visits	As needed	Local Government Representative
	Handling of complaints and feedback				

Target Group	Training Topic	Objectives	Delivery Method	Frequency	Responsible Party
Municipal or Line Ministry Staff	Regulatory compliance	Enhance the government's supervisory role.	Formal training sessions	Bi-annually	Project Implementing Unit (PIU)
	Monitoring & enforcement procedures	Ensure regulatory alignment.	Technical briefings	After regulatory updates	Ministry of Environment

9 Monitoring and Reporting

The CERP PIU will be responsible for monitoring and reporting on results, with support from relevant stakeholders. To ensure accurate reflection of the project's progress, the CERP PIU will collect and analyse data from stakeholders, periodically updating the Results Framework to capture on-the-ground realities. In the event of a CERP activation, additional response-specific indicators will be incorporated.

The recipient will submit quarterly CERP reports that assess progress against the ESCP, integrating M&E results and proposing adjustments to ensure effective implementation. These reports will be provided annually when no crisis is present, and at least semi-annually during an active crisis. Six months after the CERP activation ends, a completion report will be prepared, evaluating the performance of all parties and outlining a plan to sustain the CERP's achievements.

The CERP PIU E&S Specialists will submit quarterly reports based on monitoring reports by the implementing agency's E&S Specialists of the implementation of E&S obligations under the relevant activities in accordance with the ESCP and this ESMP and prepare quarterly monitoring reports on the environmental, social, health and safety (E&S) performance of the Project. The reports shall include:

- Status of implementation of E&S documents required under the ESCP.
- Summary of stakeholder engagement activities carried out.
- Complaints submitted to the grievance mechanism(s), the grievance log, and progress made in resolving them.
- E&S performance of the project.
- Number and status of resolution of incidents and accidents reported under action C below.
- Any other aspects requested by the Association.

Implementing Partners will report on the relevant obligations in relation to their activities to the CERP PIU E&S Specialists. The content of partner reports will be included into the overall quarterly E&S report to the World Bank.

Annex 1: E&S Reporting Checklist for Project Activities

The template below is presented for the quarterly E&S report, which the PIU will provide to the World Bank. The PIU will prepare tailor-made reporting formats to the Implementing Partners and contractor, capturing necessary information from their respective activities.

Template for the Quarterly Report on the Environment and Social Aspects of the CERP

The objectives of the periodic report are:

To record environmental and social impacts and risks resulting from the project activities and to ensure implementation of the mitigation, monitoring and institutional measures identified in the Environment and Social Commitment Plan (ESCP) and the ESMP, functionality of the GRM, accidents, and any other environmental and social instruments e.g. LMP, in order to reduce adverse impacts and risks and enhance positive impacts from specific project activities;

- Identify and address any unexpected or unforeseen environmental and social impacts or risks, that may arise during the period of the reporting;
- Address any unexpected issues that may impact on the implementation of the project or compliance with the E&S requirements;
- To ensure that the implementation of the project is in line with the WB ESS;
- To ensure development and implementation of necessary occupational health and safety management plans to identify hazards and mitigate risks, to ensure safe working procedures;
- To report any changes in the project activities requiring a material change in the ESCP and/or other project instruments (e.g. ESMP, LMP etc) during the monitoring period, and
- To propose mitigations and corrective measures or actions for unforeseen adverse environmental and social risks and impacts identified during the monitoring period of the Project.

Please fill in ALL of the following information in the following template. If there is not an applicable heading for particular information, please include a section called Other or another appropriate heading and include the information. In addition, text can be included under any table, or as an additional Annexure, to further justify, provide additional details on a topic as needed.

If there is more information that you would like to report, please do so. If you require additional columns or rows to complete the tables, please add as necessary. However please DO NOT delete columns from tables, or sections from the template. Rather indicate as not relevant, or not applicable to this reporting period.

Please delete this Guidance note section when compiling the report.

Proposed Template

Project Name	
Project Code	
Project Amount (or Component Amount if relevant)	
Board Approval Date	
Implementing Agency	
Applicable ESS standards/ Safeguard Operational Policies	
Monitoring Period	

If this is not the first report, please indicate any changes as compared to the previous reporting period.

Planned/Undertaken CERP Activities
Please provide a synopsis of the main CERP activities planned/undertaken during the reporting period.

Synopsis of the Project Activities Implemented During the Reporting Period

Description of Project work/activities	Monitoring Indicators during reporting Period	Frequency (monthly, quarterly)

Pending/Delayed Actions (If any)
Please highlight any pending or delayed actions of the precedent report (if any), as well as activities planned but not undertaken in the current reporting period, indicating reasons and/or challenges and actions to address the delay. If there are no pending or delayed actions please mark the Table as not applicable.

Table for Delayed Actions of the Project

No.	Activities (components, subcomponents) planned but not implemented	Safeguards requirements associated with the activities	Reason for delay	Actions to be taken	Timeline

Status of Implementation of the Environmental and Social Commitment Plan (ESCP).

Please use the ESCP with the following columns in sequence. (The Table can be made landscape to accommodate text or included as an annex.)

Status of the Implementation of the ESCP.

ESS#	ESCP obligations	Timeframe of ESCP obligations	Status of implementation	Justification of delays/shortcomings	Actions to be taken and timeline

Status of the Implementation of the ESMP

This section will inform/update on the status of the mitigation and monitoring measures of significant project risks, using a matrix approach including the relevant community health and safety measures. Please use the ESMP matrix with the following columns in sequence as shown below.

Status of Implementation of the ESMP

Reference	E&S Mitigation Measures	Monitoring Indicators	Linked to Investment Activity or the ESSs	Status of Implementation	Justification of delays/shortcomings	Actions to be taken and timeline

Status of the Implementation of the Project's Grievance Mechanism

This section will inform/update on the status of grievances filed and how the CERP PIU is responding to the concerns and grievances (including labour, social, environment grievances) of project-affected parties related to the environmental and social performance of the project.

- State total number of grievances recorded during the reporting period;
- How many were resolved?
- How many were referred elsewhere? Is the GRC/ GRM following up?
- How many issues are unresolved and why?
- What is the plan for the unresolved issues?
- In Annex D, please attach copies of the GRMs for this reporting period.

Overview of Grievances During the Reporting Period

#	Stakeholder	Nature of Grievance (s)	Total Grievances	Status	Remarks/ Comment(s)
	(e.g. institution, community members, local leaders, etc)			Resolved/ unresolved	

Stakeholder Engagement

This section will inform/update on the status of stakeholder engagement and how the CERP PIU is ensuring that stakeholders are being met with in line with the requirements of the Project and / or SEP as relevant. The section should outline:

- The number of engagement activities undertaken during the reporting period and types of stakeholders met with (e.g., communities, districts, neighbouring facilities, etc)
- Key issues raised or discussed during the meetings
- To what extent are the stakeholders being engaged during the implementation of E&S risks and impacts management measures?
- Do they participate in monitoring the implementation of E&S risk and impact management measures?
- Is the engagement/consultations organized according to the SEP?
- Were the participants informed before the meeting and minutes were shared with the participants?

Health and Safety Accidents

This section summarizes the Environmental, Health and Safety accidents and incidences that occurred during the reporting period. Importantly, the section includes detailed descriptions of the procedures to mitigate recurrence and avoid further injury. The section includes reports on near-misses and treats these as incidents in line with comparative accidents. The section includes a table for follow-up of earlier accidents, incidents, and near-misses.

Accident and Incident Reporting

Date and time of accident/Incident	Name of Victim	Description of the accident	Severity of Accident (Minor /Major	Mitigating measures taken by the contractor/proponent	Actions to be taken to prevent the occurrence	Status of the accident (open /closed[10])

[10] Closed incident referring to those that have all the actions completed

			injury/ death)		of the accident	

Environmental and Social Management Capacity

This section details the E&S supervision arrangements for the activities. The section includes a diagram of the reporting arrangements as well as roles and responsibilities, any vacant positions and timelines to fill them if relevant. The description may require several diagrams for various project sites.

Administration:
State any changes or updates on administrative requirements e.g. E&S personnel, location, etc.;
Any changes in terms of applicable national and international requirements.

Capacity Building:
Provide an update on any E&S safeguards related CB activities undertaken
Indicate outstanding CB activities and timelines for undertaking them.

Other Project specific issues to flag, raise, report on:

Other Specific Issues
Please answer the following questions:

Is the CERP PIU adequately staffed with skilled and permanent E&S specialists? Do they have resources (finance and equipment) to carry out field visits and supervisions?

Are the Implementing Partners adequately staffed with skilled and permanent E&S staff. Are they preparing their periodic E&S reports to the Owner?

Is the project GRM still robust enough to respond to complaints? How many complaints have been received and resolved (provide current and cumulative data?

Is there sufficient budget allocation for implementing the ES instruments?

What are the constraints to the achievement of the ESCP and ESMP?

Conclusions and Recommendations

Please summarize the major conclusions during this periodic report and recommendations for actions to be implemented in the next monitoring period. Include a summary (in a table) of measures or activities that were planned vs achieved; And state reasons why some activities are still outstanding.

Include a table of planned activities for the next quarter/ reporting period.

Annex 2: Environmental and Social Monitoring Template

This template will be based on the EMSP Table above, it will list all the above -mentioned risks and impacts, mitigation measures, indicators, responsibilities, monitoring frequency as per the table above. Prior to the commencement of the works, targets will be added to the indicators, after consultation with the contractors. The findings and observation column will be filled in upon reviews, supervision and inspection as well as based on reporting by the contractors. The corrective action column will be filled in when non-compliances have been discovered, and corrective actions have been agreed on jointly with the contractor.

Risks and Impacts	**Mitigation Measures**	**Indicators**	**Responsibility**	**Monitoring Frequency**	**Findings/Observations**	**Corrective Action**

Annex 3: Labor Management Procedures (LMP)

ESS2 on Labor and Working Conditions were identified as applicable for the CERP activities. In accordance with the requirements of ESS2, these Labor Management Procedures (LMP) were prepared. The purpose of the LMP is to set out the ways in which the PIU/PCU and all other implementers will manage all project workers in relation to the associated risks and impacts for the Project activities in . The objectives of the LMP are to:

(a) Identify the different types of project workers that are likely to be involved in the project
(b) Identify, analyze and evaluate the labor related risks and impacts for project activities
(c) Set out procedures to meet the requirements of ESS2 and applicable national legislation.

The LMP will be applied with due consideration to the requirements of national laws, the interrelatedness of ESS2 with other ESS.

The LMP will be administered to different types of project workers as follows:

(a) **Direct Workers.** People employed directly by the PIU/PCU to work specifically in relation to the project at the Ministry.
(b) **Contracted Workers.** People engaged through third parties to perform work related to core functions of the project, regardless of location. Under this category are included employees of contractors or third-party providers contracted to implement project activities. This can include UN personnel, NGOs and others.
(c) **Primary Supply Workers**. People engaged as primary suppliers. These include, for example, suppliers of goods to be procured under the project.

The LMP will apply to Project workers including fulltime, part-time, temporary and seasonal.

For Tier 1 activities there will be no use of community labor. This LMP will be updated as needed to include any community labor requirements associated with cash for works.

Labor Forecast

The following types of labor requirements are expected per type of activity. Numbers of workers cannot be estimated at this point, as activities and their scope are not known. Direct workers may come from different Ministries, as activities may require the involvement of different Ministries.

Table 10 Labor forecast

Project Activities	Types of workers
Cash transfers to households	Direct workers and contracted workers
Acquisition of food staples, medicine, medical supplies, veterinary medicine, agricultural inputs, other essential	Direct workers, contracted and supply workers

supplies, light equipment, green cookstoves, shelter materials, etc…	
Finance for surge responders, repair crews, shelter operations, transportation costs	Direct workers and contracted workers
Project Management	Direct workers

The labor requirements of the Project show that the LMP will have to cater for three categories of project workers as described in ESS2, namely direct workers, contracted workers, and primary supply workers.

Relevant Provisions in Federal republic of Somalia Labor Legislation

Table 11 Relevant Provisions in Somali Labor Related Legislation

	Issues	Somali Legislation
1	Fundamental employee rights, non-discrimination	This is provided for under Part II of the Labor Relations Act (1996)
2	Contractual arrangements, terms and working conditions of workers	This is provided for under Part V and VI of Employment Act (2000)
3	Working hours	This is provided for under Part VI of Employment Act (2000) specifically Sections 36 which is on 'Normal working hours, weekly rest, etc.'; and Section 37 on 'Maximum daily working hours'.
4	Salaries and wages and frequency of payments	This is provided for under Part VII of Employment Act (2000) specifically on Sections 50 to 55
5	Leave provisions – annual, maternity, sick and holidays	This is covered in Employment Act (2000) specifically under Part VI (sections 40,44,45,46 and 47)
6	Retrenchment/termination of contract arrangements	This is provided for Under Part V Sections 28, to 31 of the Employment Act of 2000, Employment (Amendment) Act 2010
7	Prohibition against all forms of child labor	This is provided for under Part IV of the Employment Act of 2000 on 'Employment on young persons' specifically in sections 21 to 24
8	Prohibition against forced labor	This is provided for under Part II of Employment Act (2000), specifically on section 4
9	Freedom or association and labor unions;	This is provided for under Part II of the Labor Relations Act (1996)
10	Dispute resolution/grievance management systems	This is provided for under Part V of the Labor Relations Act (1996)
11	Safety provisions	Covered under Part V and VI of the Occupational Safety, Health and Welfare Act of 1997
12	Health and employee welfare provisions	This is provided for under Part IV and VI of the Occupational Safety, Health and Welfare Act of 1997

1.1 Labour Risk Assessment

As part of the labor risks and impacts identification, the following activities will assist in understanding the exposure pathways. However, it has to be pointed out that presented here are only key risks related to workers of predictable activities:

(a) The main types of activities for direct workers will be activities in the coordination of the project activities.
(b) The main types of activities for contracted workers will be activities related to the coordination and implementation of procurement activities
(c) The main types of activities for supply workers will be related to the production and transporting of goods.

The table highlights and analyses the potential labor risks and impacts in view of the anticipated labor utilization and general baseline settings of the project areas.

Labor Risk Identification and Analysis

Risk/Impact	Analysis (Magnitude, Extent, Timing, Likelihood, Significance)	Risk Mitigation Measures
ESS2: Labor and working conditions		
Labor standards are not in accordance with national laws and international standards	Actual labor practices may differ from labor standards and laws.	Through the implementation of this LMP these gaps are addressed.
Underpayment of contracted workers or supply workers	Despite the existence of a legally defined minimum wage, there is a risk that contracted, and supply workers are underpaid.	The project will enforce the minimum wage and implement it throughout the project / cascade it down to suppliers. A workers' grievance mechanism will be adopted and implemented.
Labor disputes over contracts	It is possible that disputes over contracts emerge among contracted and supply workers.	The project will provide workers' GRM with an appeals mechanism outside of the direct employer.
Poor working conditions: Unsafe work environment	The working conditions of supply workers may be poor. The impact is significant, as it is not known as yet where supplies will be sourced from.	Supervision of Supplier Labor Management Practices is essential to mitigate against this risk. A supplier checklist will be used.
Discrimination against women in employment	Women are often still discriminated against in employment, withing Somalia but also possibly among foreign suppliers.	Contractors and suppliers are compelled to safeguard the interests of women, including gender parity at the workspace, appropriate sanitation facilities at workplace, and appropriate PPE for women. The Project will monitor these measures during field visits where possible and will require every contracted worker to sign a CoC, as well as adopt and implement workers' GM.
SEA/SH risks among workers	There is a high incidence of SH of female workers by other workers. However, given that the main activities consist of procurement, the magnitude of this risk is moderate.	The Project takes a zero tolerance stand vis-à-vis SEA/SH toward all workers by other project workers. It will require the signing of CoCs by every direct worker.

Use of child labor	The general minimum age for work is 14 (which is in accordance with ILO standards on minimum age where a country's economy and educational facilities are insufficiently developed). Given that the main activities consist of procurement, the risk of child labor is low among contracted workers. However, given that it is not known yet where goods are sourced from, there is a moderate to substantial risk of child labor among suppliers.	The minimum age of 18 will be enforced in recruitment for direct workers on the Project. Suppliers will be contractually bound to comply with child labor prohibitions. During the procurement process, potential suppliers will be assessed for past abuses. The Project will apply the IFC Exclusion list as guidance for procurement and the PIU/PCU will ensure that suppliers are not involved in any of the listed activities.
Forced Labor	Given that the main activities consist of procurement, the risk of forced labor is low among contracted workers. However, given that it is not known yet where goods are sourced from, there is a moderate to substantial risk of forced labor among suppliers.	Suppliers will be contractually bound to comply with forced labor prohibitions. During the procurement process, potential suppliers will be assessed for past abuses. The Project will apply the IFC Exclusion list as guidance for procurement and the PIU/PCU will ensure that suppliers are not involved in any of the listed activities.
Traffic accidents	Given that goods will be transported to their storage location, there is a risk of traffic accidents affecting community members and contracted and supply workers.	Implement Traffic Management Framework

Institutional Arrangements for Implementation of LMP

Given the categories of project workers (direct workers, contracted workers, primary supply workers), this section lays out the operational arrangements amongst the various institutions that are collaborating with the Project to ensure the smooth implementation of the LMP. The requirements of the LMP apply to all categories of project workers and where there is a special emphasis for a particular category of workers, it is highlighted within the applicable section of the LMP.

The requirements of the LMP as applicable to the direct workers will be the responsibilities of the respective PIU/PCU. The PIU/PCU will however have an oversight role vis-à-vis other contractors or third-party providers through direct reporting arrangement on the requirements of the LMP in particular and other ESMP requirements in general.

Contracted workers are those who will be employed by contractors or third -party providers to execute the project activities. Where the LMP refers to contractor responsibilities, it also refers to any other third -party provider. The contractor has the responsibility to ensure LMP implementation at the interface with its respective sub-contractors, while the PIU/PCU oversees the LMP implementation at all levels.

The Primary Suppliers are identified by the PIU/PCU or by an implementing partner. Upon the selection of the supplier, the LMP will be affirmed. Implementing partners have the obligation to ensure that all the procedures for primary supply workers are observed, though the PIU/PCU will have the overall responsibility. ESS2 applies a proportionality approach to oversight responsibility towards suppliers.

Terms and Conditions

Government civil servants, who may provide support to the Project, will remain subject to the terms and conditions of their existing public sector employment agreement or arrangement as provided in the Somalia Public Service Regulations (MPSR) and other government circular. The Project staff and consultants will remain subject to the terms and conditions of currently in place at the MoF**.** The following terms and conditions will guide management of workers engaged by the implementing partners under the project:

- Workers to be involved should be at least 18 years of age;
- Workers will have an opportunity to negotiate their wages equal or above the government set minimum wage rate;
- Difference in wages will not be influenced by race, color, sex, language, religion, political or other opinion, nationality, ethnic or social origin, disability, property, birth, marital or other status or family responsibilities or other matters arising out of the employment relationship;
- Payment of wages will be done at most on monthly basis on the last day of each month.

During recruitment of workers the Implementing Partners will explain the terms and conditions prior to commencement of work. Section 27 of the Employment Act makes it mandatory for employers to give employees a copy of the written particulars of employment, signed by both parties within one month of employment. Violation of the workers' Code of Conduct will constitute misconduct. In ensuring full compliance with the law in this regard, contractors will be required to furnish PIU/PCU with copies of the Written Particulars of Employment or copies of contract of all its workforce.

Key Procedures

The Project will promote sound worker-management relationships and enhance the development benefits of a project by treating workers in the project fairly and providing safe and healthy working conditions.

The PIU/PCU and implementing partners and all project workers will follow up in ensuring the full accomplishment of the objectives of ESS2 in specific.

Recruitment and Replacement Procedure

Procedure Objective
The objective of this procedure is to ensure that the recruitment process and placement of project workers is conducted in a manner which is non-discriminatory, and employees are inducted to all essential work-related matters.

Procedure

1. Contractors submit a recruitment plan to the PIU/PCU for review and approval. The following details will be shown:
   i. Number of staff required
   ii. Intended working condition
   iii. Intended locations of staff
   iv. Job specifications in terms of qualification and experience
2. Contractor publishes the job invitation in the appropriate media (local press or direct invitation for contracted worker, or word of mouth through local leaders for community workers) to ensure all potential candidates have access to the information, including women and persons with disabilities, actively addressing risks of nepotism, or other forms of recruitment or employment discrimination.
3. Shortlist and recruit candidates ensuring the following;
   i. As far as possible, 50% shortlisted candidates are women.
   ii. As far as possible, 50% engaged employees are women.
   iii. Screen out candidates under the age of eighteen years.
4. On recruitment, ensure a contract of employment is signed voluntarily, for both contracted workers and community workers.
5. Before commencement of work, the contractor will ensure the employee is inducted on the essential work -related issues, which include the following;

i. Key Job Specifications
ii. Terms and Conditions of Employment
iii. Special Codes of Conduct
iv. Disciplinary Procedures
v. Workers' Grievance Redress Mechanism
vi. Freedom to join and participate fully in Workers Association activities, Employment Council or Trade Union
vii. Key E&S aspects of the Project and its ESMP and other E&S instruments
viii. Emergency Preparedness

6. Maintain all such employment records available for review by the respective PIU/PCU, the World Bank, or Regulatory Authority.

Workers' Grievance Redress Procedure

a. Objectives of the procedure

The objective of this procedure is to settle the grievance between an employer and employee or between employees bilaterally before recourse to formal dispute resolution. Under the provisions of ESS2, the project will provide a grievance mechanism for all direct and contracted workers to raise workplace concerns. Workers will be informed of this grievance mechanism at the time of recruitment and the measures put in place to protect them from any reprisal for its use. The project will put in place measures to make the worker grievance mechanism easily accessible to all project workers.

b. Procedure

1. The PIU/PCU will only engage contractors with registered CoC or who sign an undertaking to comply with the relevant provisions for contracted workers and contractors who will comply with community meetings resolutions on applicable rules in the case of community workers.
2. Implementing partners induct the employees on the applicable workers' GRM to be aware of their rights. All records of induction shall be kept and made available to the PIU/PCU.
3. In case of violation, the aggrieved employee must capture and present the details of the grievance to the person they report to or the supervisor's superior in case of conflict of interest.
4. The supervisor will verify the details and seek to address the matter within the shortest time (up to 48 hours).
5. The supervisor will escalate the matter if not resolved within 48 hours if a resolution is not found.
6. Where no resolution is found, the employee can escalate the matter to the sector specific institutions or courts who will resolve the matter between employer and employee. The Supreme Court's decision is final, where it has exercised lawful jurisdiction.
7. Where the formal courts are not accessible, do not exist in an area, or cannot render a judgment, the matter shall be reported to and handled under the PIU/PCU, for example through the project GM. The PIU/PCU, in this case, will accommodate a fair agreement between the worker and the implementing partner.
8. The implementing partner shall keep records of all proceedings of grievance redress that are within their jurisdiction and furnish the PIU/PCU as part of the periodic progress reporting to the PIU/PCU.
9. In case of risk of retaliation, the employee may immediately escalate to the court system. If confidentiality is requested, the PIU/PCU will ensure it to avoid any risk of retaliation, including in its follow-up actions.

Procedure for Primary Suppliers

Primary supply workers are employees of suppliers who, on an ongoing basis, provide goods and services to the Project. PIU/PCU have oversight of the implementation of the LMP requirements in this category.

Objective of the procedure
The objective of the procedure is to ensure that labor-related risks to the project from primary supply workers are managed in line with the requirements of ESS2.

Procedure
PCU/PIU will undertake the following measures:

i. Procure supplies from legally constituted suppliers. The legal registration ensures that the company is legally obliged to comply with all applicable labor laws and other laws in Somalia. This will include evidence of
- Certificate of incorporation
- Tax Clearance
- Value Added Tax certificate
- Registration of supplier with regulatory body for the goods or services where required

ii. Make a physical check on the supplier's labor management system, including
- employee contracts
- OHS
- any past work-related environmental or occupational incidents
- workers committee in place

iii. Check products quality certification and environmental rating where required

iv. Undertaking to take back waste for reuse, for example containers and packaging where applicable

i. Possibility of training in safe use of product by community users where applicable

ii. Where potential child labor or forced labor or serious safety risks are identified in a specific sector or industry, in connection with the supply of goods, a mapping exercise should be conducted to identify suppliers relying on such goods.

iii. Where it is not possible to identify specific primary suppliers, the mapping should identify general industry labor issues relating to the supply of the respective goods.

Terms and Conditions of Project Workers

The specific terms and conditions for the different categories of project workers and different types of activities will be defined in the inception phase of the project, they will draw on currently applied terms and conditions by the PIU/PCU.

Monitoring and Supervision

The performance monitoring of this LMP will follow the same institutional arrangement as the monitoring and supervision of the ESMP. In general, the respective PIU/PCU will be responsible for the monitoring of the implementation of the LMP. In particular, the Social Specialist in the PIU/PCU will work directly to ensure that the LMP is fully implemented.

The Social Specialist will undertake supervision missions and spot checks as per a schedule to be developed once sites have been selected. Through the initial activity- or site-specific screening process, the Social Specialist will be aware of potential labor-related risks and impacts of activities and will develop a monitoring schedule around these.

Non-compliance of the LMP will be reported to the PIU/PCU Project Manager and will be taken up in the regular E&S reporting.

Annex 4: Waste Management Framework

This framework allows taking stock of the existing situation, defining the objectives that need to be met, formulating appropriate strategies, and identifying the necessary implementation means. This General Waste Management Framework will guide for reducing, reusing, recycling, and last resort disposing of waste during the project activities, such as packaging deriving from food and water supply, and including associated handling, storage, transport, and disposal procedures. Detailing all types of waste and their origins, the steps taken to lower the level of waste, and plans for removing and eliminating waste, is what constitutes effective waste management planning.

This General Waste Management Framework presents the activities to be conducted to support the safe handling of general waste during the project implementation in compliance with the World Bank's General Environmental, Health, and Safety (EHS) Guidelines on Waste Management.

It should be noted that this Annex focuses on the handling and management of only non-hazardous waste. This Framework will assist in the development of activity or site-specific Waste Management Plans. It will be given to implementers and suppliers to keep waste at a minimum. The Framework is therefore a binding document that shall be legally recognized and is expected to be implemented at the same level of importance as any other legally binding contractual document.

The Project will ensure that this instrument, alongside the rest of the E&S instruments are disseminated to the implementing partners and the rest of the project team. Capacity building training will be organized to ensure that the contents of all the instruments are well understood and that every stakeholder fully understand their roles and that they have the capacity to perform those roles.

This plan has been prepared to explain the management of the different types of waste that will be generated during the CERP. The likely wastes are pieces of packaging from food and water supply, or general waste produced by office work. Traffic operations may produce small amounts of waste plastic containers for oils and lubricants, broken filters and belts, and damaged tires will be generated. Managerial staff will also generate some waste such as paper, bottles, cans, plastics, and food scraps. Waste related to medical supplies is handled in a separate plan.

This Framework will reduce the risk(s) of destroying and/or polluting the environment. It therefore, expresses the commitment to prevent of any adverse impacts to the local environmental conditions from any project activities that generate waste by the implementation of waste management principles and best practice strategies.

The Objectives are as follows:

- Minimizing waste generation in line with the principles of the waste hierarchy as reduce, reuse and recycle.
- Safely disposing of all non-reusable and non-recyclable hazardous and non-hazardous wastes and;
- Complying with relevant regulations and standards.
- Increase the efficiency of the use of raw material;
- Reuse, reduce or recycle material where feasible;
- Promote awareness of and adhere to proper waste management procedures;
- Managing waste as close to the source as practicable;
- Take cognizance of our Duty of Care to the environment.

TYPES OF WASTE AND MANAGEMENT

This procedure describes Non-Hazardous Waste as waste that causes no harm to humans or environmental health. Such waste can be categorized into biodegradable and non-biodegradable waste. Biodegradable waste includes any organic matter which can be broken down into carbon dioxide, water, methane, compost, humus, and simple organic molecules by micro-organisms. Non-biodegradable waste is those that cannot be decomposed or dissolved by natural agents. –During the site activities, waste will be generated from sources such as the project mini camps and distribution and transmission line worksites.

Waste Generated Proposed Management Method

Type of Waste	Management Measures
Wood (timber, slash, stumps, etc.)	Reuse, donate, dispose
Treated wood (poles, cross arms	Reuse, donate, dispose
Metals (Ferrous and Non-Ferrous) (But not including drained electrical equipment (transformers, etc.) *refer hazardous substances.*	Reuse, Recycle, dispose.
Food waste	Composting, dispose
Wooden Cable Spools & Pallets	Reuse, donate, Dispose
Paper and Cardboard	Recycle
Concrete wastes	Reuse, Dispose in landfill

plastics	Reuse, Dispose, Recycle
Office waste	Recycle, dispose.

Record Keeping: Data on waste production and disposal will be gathered continually via waste registers. These records will be maintained on site and made available to all authorities and any other body to audit or assess the waste management practices on site. This data will include the final destination of each waste stream and where disposal has occurred proof of safe disposal will be required (such as stamped waste disposal ticket issued by a sanitary landfill). A cost will be paid for safe disposal of any hazardous wastes. Evidence of waste disposal will always be maintained.

MAJOR CATEGORIES OF MEDICAL WASTE

Waste Type	Description
Infectious waste	Susceptible to contain pathogens or toxins. Examples: discarded materials or equipment, dressings, swabs, nappies, blood bags, faeces, urine, blood, body secretions.
Pathological and anatomical waste	Organs, tissues, body parts, fluids such as blood. Recognizable human body parts, infected or not.
Hazardous pharmaceutical waste	Expired, unused, contaminated pharmaceutical products, drugs, vaccines. Includes discarded items used in handling pharmaceuticals like bottles, vials, connecting tubing.
Hazardous chemical waste	Discarded chemicals (solid, liquid, gaseous) from disinfecting procedures. May be toxic, corrosive, flammable, reactive. Must be disposed of according to container specifications.
Waste with high content of heavy metals	Highly toxic waste with high contents of heavy metals and derivatives (e.g. cadmium, mercury from thermometers, manometers).
Pressurized containers	Full or emptied containers or aerosol cans with pressurized liquids, gas, powdered materials.
Sharps	Items that can cause cuts or puncture wounds (e.g. needle stick injuries). Highly dangerous, potentially infectious waste. Must be segregated, packed, handled specifically within HCF for safety.
Highly infectious waste	Microbial cultures, stocks of highly infectious agents from medical laboratories. Includes body fluids of patients with highly infectious diseases.
Genotoxic/cytotoxic waste	Drugs and equipment used for mixing, administration of cytotoxic drugs. Cytotoxic or genotoxic drugs reduce growth of certain living cells, used in chemotherapy for cancer.
Radioactive waste	Liquids, gas, solids contaminated with radio nuclides with ionizing radiations having genotoxic effects. Includes x- and g-rays, a- and b- particles.

Treatment and Disposal Methods for Healthcare Waste Categories

Type of waste	**Summary of treatment and disposal options/notes**
Infectious waste: Includes waste suspected to contain pathogens (e.g., bacteria, viruses, parasites, or fungi) in sufficient concentration or quantity to cause disease in susceptible hosts. Includes pathological and anatomical material (e.g., tissues, organs, body parts, human fetuses, animal carcasses, blood, and other body fluids), clothes, dressings, equipment / instruments, and other items that may have come into contact with infectious materials.	Waste Segregation Strategy: Yellow or red colored bag/container marked "infectious" with international infectious symbol. Strong, leak proof plastic bag, or container capable of being autoclaved. Treatment: Chemical disinfection; Wet thermal treatment; Microwave irradiation; Safe burial on hospital premises; Sanitary landfill; Incineration (Rotary kiln; pyrolytic incinerator; single-chamber incinerator; drum or brick incinerator) e • Highly infectious waste, such as cultures from lab work, should be sterilized using wet thermal treatment, such as autoclaving. • Anatomical waste should be treated using Incineration (Rotary kiln; pyrolytic incinerator; single- chamber incinerator; drum or brick incinerator).
Sharps: Includes needles, scalpels, blades, knives, infusion sets, saws, broken glass, and nails etc.	Waste Segregation Strategy: Yellow or red color code marked "Sharps". Rigid, impermeable, puncture-proof container (e.g., steel or hard plastic) with cover. Sharp's containers should be placed in a sealed, yellow bag labeled "infectious waste". Treatment: Chemical disinfection; Wet thermal treatment; Microwave irradiation; Encapsulation; Safe burial on hospital premises; Incineration (Rotary kiln; pyrolytic incinerator; single-chamber incinerator; drum or brick incinerator) e • Following incinerators, residues should be landfilled • Sharps disinfected with chlorinated solutions should not be incinerated due to risk of generating POPs • Needles and syringes should undergo mechanical mutilation (e.g., milling or crushing) prior to wet thermal treatment
Pharmaceutical waste: Includes expired, unused, spoiled, and contaminated pharmaceutical products, drugs, vaccines, and sera that are no longer needed, including containers and other potentially contaminated materials (e.g. drug bottles vials, tubing etc.).	Waste Segregation Strategy: Brown bag / container. Leak-proof plastic bag or container. Treatment: Sanitary landfill[a]; Encapsulation[a]; Discharge to sewer [a]; Return expired drugs to supplier; Incineration (Rotary kiln; pyrolytic incinerator [a]); Safe burial on hospital premises[a] as a last resort. • Small quantities: Landfill disposal acceptable, however cytotoxic and narcotic drugs should not be landfilled. Discharge to sewer only for mild, liquid pharmaceuticals, not antibiotics or cytotoxic drugs, and into a large water flow. Incineration acceptable in pyrolytic or rotary kiln incinerators, provided pharmaceuticals do not exceed 1 percent of total waste to avoid hazardous air

Type of waste	Summary of treatment and disposal options/notes
	emissions. Intravenous fluids (e.g., salts, amino acids) should be landfilled or discharged to sewer. Ampoules should be crushed and disposed of with sharps. • Large quantities: Incineration at temperatures exceeding 1200 °C. Encapsulation in metal drums. Landfilling is not recommended unless encapsulated in metal drums and groundwater contamination risk is minimal.
Genotoxic / cytotoxic waste: Genotoxic waste may have mutagenic, teratogenic, or carcinogenic properties, and typically arises from the feces, urine, and vomit of patients receiving cytostatic drugs, and from treatment with chemicals and radioactive materials. Cytotoxic drugs are commonly used in oncology and radiology departments as part of cancer treatments.	Waste Segregation Strategy: See above for "infectious waste". Cytotoxic waste should be labeled "Cytotoxic waste". Treatment: Return expired drugs to supplier; Chemical degradation; Encapsulation[a]; Inertization; Incineration (Rotary kiln, pyrolytic incinerator); • Cytotoxic waste should not be landfilled or discharged to sewer systems. • Incineration is the preferred disposal option. Waste should be returned to supplier where incineration is not an option. Incineration should be undertaken at specific temperatures and time specifications for particular drugs. Most municipal or single chamber incinerators are not adequate for cytotoxic waste disposal. Open burning of waste is not acceptable. • Chemical degradation may be used for certain cytotoxic drugs – See Pruss et al. (1999) Annex 2 for details. • Encapsulation and inertization should be a last resort waste disposal option.
Chemical waste: Waste may be hazardous depending on the toxic, corrosive, flammable, reactive, and genotoxic properties. Chemical waste may be in solid, liquid, or gaseous form and is generated through use of chemicals during diagnostic / experimental work, cleaning, housekeeping, and disinfection. Chemicals typically include formaldehyde, photographic chemicals, halogenated and nonhalogenated solvents d, organic chemicals for cleaning / disinfecting, and various inorganic chemicals (e.g., acids and alkalis).	Waste Segregation Strategy: Brown bag / container. Leak-proof plastic bag or container resistant to chemical corrosion effects. Treatment: Return unused chemicals to supplier; Encapsulation[a]; Safe burial on hospital premises[a]; Incineration (Pyrolytic incinerator[a]; • Facilities should have permits for disposal of general chemical waste (e.g. sugars, amino acids, alts) to sewer systems. • Small hazardous quantities: Pyrolytic incineration, encapsulation, or landfilling. • Large hazardous quantities: Transported to appropriate facilities for disposal or returned to the original supplier using shipping arrangements that abide by the Basel Convention. Large quantities of chemical waste should not be encapsulated or landfilled
Radioactive waste: Includes solid, liquid, and gaseous materials that have been contaminated with radionuclides. Radioactive waste originates from activities such as organ imaging, tumor localization, radiotherapy, and research / clinical laboratory	Waste Segregation Strategy: Lead box, labeled with the radioactive symbol. Treatment: Radioactive waste should be managed according to national requirements and current guidelines from the International Atomic Energy Agency. IAEA (2003). Management of Waste from the Use of Radioactive Materials in Medicine, Industry and Research. IAEA Draft Safety Guide DS 160, 7 February 2003.

Type of waste	Summary of treatment and disposal options/notes
procedures, among others, and may include glassware, syringes, solutions, and excreta from treated patients.	
Waste with high content of heavy metals: Batteries, broken thermometers, blood pressure gauges, (e.g., mercury and cadmium content).	Waste Segregation Strategy: Waste containing heavy metals should be separated from general health care waste. Treatment: Safe storage site designed for final disposal of hazardous waste. • Waste should not be burned, incinerated, or landfilled. Transport to specialized facilities for metal recovery
Pressurized containers: Includes containers/cartridges /cylinders for nitrous oxide, ethylene oxide, oxygen, nitrogen, carbon dioxide, compressed air and other gases.	Waste Segregation Strategy: Pressurized containers should be separated from general health care waste. Treatment: Recycling and reuse; Crushing followed by landfill • Incineration is not an option due to explosion risk. • Halogenated agents in liquid form should be disposed of as chemical waste, as above.
General health care waste (including food waste and paper, plastics, cardboard.	Waste Segregation Strategy: Black bag / container. Halogenated plastics such as PVC should be separated from general health care facility waste to avoid disposal through incineration and associated hazardous air emissions from exhaust gases (e.g. hydrochloric acids and dioxins). Treatment: Disposal as part of domestic waste. Food waste should be segregated and composted. Component wastes (e.g., paper, cardboard, recyclable plastics [PET, PE, PP], glass) should be segregated and sent for recycling.

Source: Safe Management of Wastes from Health-Care Activities. International Labor Organization (ILO), Eds. Pruss, A. Giroult, and P. Rushbrook (1999)

Notes:

a. small quantities only

b. Low-level infectious waste only

c. Low-level liquid waste only

d. Halogenated and nonhalogenated solvents (e.g., chloroform, TCE, acetone, methanol) are usually a laboratory-related waste stream for fixation and preservation of specimens in histology /pathology and for extractions in labs.

e. Note on incinerators. Pyrolytic and rotary kiln incinerators should be used. Use of single-chamber and drum / brick

INCIDENT REPORT FORM

The following report form is to be completed by the PIU/PCU within 24 hours in the case of an incident/accident:

Incident report form

B1: Incident Details			
Date of Incident:	**Time:**	**Date Reported to PIU:**	**Date Reported to WB:**
Reported to PIU by:	**Reported to WB by:**	**Notification Type**: Email/"phone call/media notice/other	
Full Name of Main Contractor:		**Full Name of Subcontractor:**	

B2: Type of incident (please check all that apply)[1]
Fatality ☐ Lost Time Injury ☐ Displacement Without Due Process ☐ Child Labor ☐ Acts of Violence/Protest ☐ Disease Outbreaks ☐ Forced Labor ☐ Unexpected impacts on heritage resources ☐ Unexpected impacts on biodiversity resources ☐ Environmental pollution incident ☐ Dam failure ☐ Other ☐

See Annex for definitions

B3: Description/Narrative of Incident
For example: *I. What is the incident?* *II. What were the conditions or circumstances under which the incident occurred (if known)?* *III. Are the basic facts of the incident clear and uncontested, or are there conflicting versions? What are those versions?* *IV. Is the incident still ongoing or is it contained?* *V. Have any relevant authorities been informed?*

B4: Actions taken to contain the incident			
Short Description of Action	**Responsible Party**	**Expected Date**	**Status**
For incidents involving a contractor: Have the works been suspended under Contract GCC8.9? Yes ☐; No ☐; Name of Contractor:			

B5: What support has been provided to affected people

The following report form will be completed by the PCU following investigations into an incident:

Table 12 Incident form to be completed after investigation

C3a: Fatality/Lost time Injury information

Cause of fatality/injury for worker or member of the public (please check all that apply):

1. Caught in or between objects ☐ 2. Struck by falling objects ☐ 3. Stepping on, striking against, or struck by objects ☐ 4. Drowning ☐ 5. Chemical, biochemical, material exposure ☐ 6. Falls, trips, slips ☐ 7. Fire & explosion ☐ 8. Electrocution ☐ 9. Homicide ☐ 10. Medical Issue ☐ 11. Suicide ☐ 12. Others ☐

Vehicle Traffic: 13. Project Vehicle Work Travel ☐ 14. Non-project Vehicle Work Travel ☐ 15. Project Vehicle Commuting ☐ 16. Non-project Vehicle Commuting ☐ 17.Vehicle Traffic Accident (Members of Public Only) ☐

Name	Age/DOB	Date of Death/Injury	Gender	Nationality	Cause of Fatality/Injury	Worker (Employer)/Public

C3b: Financial Support/Compensation Types (To be fully described in Corrective Action Plan template)

1. Contractor Direct ☐ 2. Contractor Insurance ☐ 3. Workman's Compensation/National Insurance ☐ 4. Court Determined Judicial Process ☐ 5. Other ☐ 6. No Compensation Required ☐

Name	Compensation Type	Amount (US$)	Responsible Party

C4: Supplementary Narrative

C1: Investigation Findings

For example:

I. *where and when the incident took place*
II. *who was involved, and how many people/households were affected*
III. *what happened and what conditions and actions influenced the incident*
IV. *what were the expected working procedures and were they followed*
V. *did the organization or arrangement of the work influence the incident*
VI. *were there adequate training/competent persons for the job, and was necessary and suitable equipment available*
VII. *what were the underlying causes; where there any absent risk control measures or any system failures*

C2: Corrective Actions from the investigation to be implemented (To be fully described in Corrective Action Plan)

Action	Responsible Party	Expected Date

The following incident form will be completed by the PCU in the case of SEA/SH cases, within 24 hours:

Incident Report Form for SEA/SH cases

B1: Incident Details		
Date of incident intake by the project/GM: **Reported to project/GM by:** ☐ Survivor ☐ Third party ☐ Other: ______ **Is a record of this incident in GM?** Yes ☐ No ☐	**Date Reported to PIU:** **Reported to PIU by:** ☐ GM operator ☐ Directly, by Survivor ☐ Directly, by third party ☐ Other: ______	**Date Reported to WBG:** **Reported to WBG by:** ☐ PIU ☐ Directly, by Survivor ☐ Directly, by third party ☐ Other: ______

B2: Incident type (please check all that apply) See Appendix 1 for definitions
Sexual exploitation ☐ **Sexual abuse** ☐ **Sexual harassment** ☐

B3: Provide the following details from the GM record	
Age of survivor (if recorded in GM):	Have the national legislation or mandatory reporting requirements been followed? Yes ☐ No ☐
Sex of survivor (if recorded in GM): Male ☐ Female ☐ Other ☐ Is the survivor employed by the project (as indicated by the survivor or complainant and reported in the GM)? Yes ☐ No ☐	Was the survivor referred to service provision?[29] Yes ☐ No ☐ Is the alleged perpetrator employed by the project (as indicated by the survivor or complainant and reported in the GM)? Yes ☐ No ☐

B4: Basis for further action	
a. Has the complainant provided informed consent to lodge a formal complaint? Yes ☐ No ☐	c. Has the survivor provided informed consent to be part of an investigation into misconduct? Yes ☐ No ☐
b. Does the employer have a suitable administrative process and capacity in place to investigate misconduct relating to SEA/SH in a survivor-centered way? Yes ☐ No ☐	d. Has the complaint been filed anonymously or through a third party? Yes ☐ No ☐
If the answer to any of these questions is no, has the GM assessed the risks and benefits of carrying out an investigation into the alleged misconduct, taking into account the survivor's safety and wellbeing? Yes ☐ No ☐	
Will an investigation into misconduct be undertaken in addition to an investigation into adequacy of project systems, processes or procedures? Yes ☐ No ☐	

The following form will be completed by the PCU in case of SEA/SH cases – following investigations:

SEA/SH incident report form after investigations

C1: Findings of the investigation		
Have sanctions against a perpetrator been recommended as part of an investigation into misconduct? Yes ☐ No ☐	Has an investigation into adequacy of project systems, processes or procedures been undertaken? Yes ☐ No ☐	
C2: Corrective actions to be implemented (To be fully described in Corrective Action Plan)		
Short Description of Action (SEA/SH examples)	**Responsible Party**	**Timeline for completion/Status**
Referral of Survivor to holistic care services		
Undertake disciplinary investigation in accordance with GM timelines and confirmed process		
Disciplinary actions, including sanctions, to be applied following misconduct investigation by Employer		
Increased training on Codes of Conduct (CoC)		
Audit of implementation of SEA/SH safety mitigation		
Strengthened awareness training on project-related risks, CoC and how to report incidents for project-affected community		
Training for project supervisors on the need to follow guidelines of behaviour in CoC and their supervisory responsibilities		
Plan to improve coverage/quality of service provision		
Any other system strengthening measures or corrections for system failures that are necessary		

C3: For incidents involving a Contractor:
Has the incident been referred to the DAAB? Yes ☐ No ☐

Annex 5: Code of Conduct for Workers

International Labor Conventions and Recommendations: The International Labor Standards (i.e., Conventions and Recommendations) have served as the foundation on which much of this Code of Conduct is based.

1. Scope of Application: It is expected that these principles apply to contractors, suppliers and their employees, parent, subsidiary or affiliate entities and subcontractors. It is expected that contractors ensure that this Code of Conduct is communicated to their employees, parent, subsidiary and affiliated entities as well as any subcontractors, and that it is done in the local language and in a manner that is understood by all. This Code of Conduct provides the minimum standards expected. In addition, contractors should note that certain provisions of this Code of Conduct will be binding in the event the contractor is awarded a contract by the Project pursuant to the terms and conditions of any such contract. Failure to comply with certain provisions may also preclude contractors from being eligible for a contract award.

2. Continuous Improvement: The provisions as set forth in this Code of Conduct provide the minimum standards expected of contractors. It is expected that contractors strive to exceed both international and industry best practices. It is also expected that contractors encourage and work with their own suppliers and subcontractors to ensure that they also strive to meet the principles of this Code of Conduct. It is recognized that reaching some of the standards established in this Code of Conduct is a dynamic rather than static process and encourages suppliers to continually improve their workplace conditions accordingly.

3.Management, Monitoring and Evaluation: It is the expectation that contractors, at a minimum, have established clear goals toward meeting the standards set forth in this Code of Conduct. It is expected that contractors will establish and maintain appropriate management systems related to the content of this Code of Conduct, and that they actively review, monitor and modify their management processes and business operations to ensure they align with the principles set forth in this Code of Conduct. Contractors participants in the Global Compact are strongly encouraged to operationalize its principles and to communicate their progress annually to stakeholders.

Labor:

4. Freedom of Association and Collective Bargaining: It is expected that contractors recognize the freely-exercised right of workers, without distinction, to organize, further and defend their interests and to bargain collectively, as well as to protect those workers from any action or other form of discrimination related to the exercise of their right to organize, to carry out trade union activities and to bargain collectively.

5. Forced or Compulsory Labor: It is expected that contractors prohibit forced or compulsory labor in all its forms

6. Child Labor: It is expected that contractors do not employ: (a) children below 18 years of age or, if higher than that age, the minimum age of employment permitted by the law of the country or countries where the performance, in whole or in part, of a contract takes place, or the age of the end of compulsory schooling in that country or countries, whichever is higher; and (b) persons under the age of 18 for work that, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of such persons.

7. Discrimination: It is expected that contractors ensure equality of opportunity and treatment in respect to employment and occupation without discrimination on grounds of race, colour, sex, religion, political opinion, national extraction or social origin and such other ground as may be recognized under the national law of the country or countries where the performance, in whole or in part, of a contract takes place. It is expected that contractors take all appropriate measures to ensure that neither themselves nor their parent, subsidiary, affiliate entities or their subcontractors are engaged in any gender-based or other discriminatory employment practices, including those relating to recruitment, promotion, training, remuneration and benefits.

8. Wages, Working Hours and Other Conditions of Work: It is expected that contractors ensure the payment of wages in legal tender, at regular intervals no longer than one month, in full and directly to the workers concerned. Suppliers should keep an appropriate record of such payments. Deductions from wages are permitted only under conditions and to the extent prescribed by the applicable law, regulations or collective agreement and suppliers should inform the workers concerned of such deductions at the time of each payment. The wages, hours of work and other conditions of work provided by suppliers should be not less favorable than the best conditions prevailing locally (e.g. collective agreements covering a substantial proportion of employers and workers' / arbitration awards / applicable laws or regulations) for work of the same character performed in the trade or industry concerned in the area where work is carried out.

9. Health and Safety: It is expected that contractors ensure, so far as is reasonably practicable, that: (a) the workplaces, machinery, equipment and processes under their control are safe and without risk to health; (b) the chemical, physical and biological substances and agents under their control are without risk to health when the appropriate measures of protection are taken; and (c) where necessary, adequate protective clothing and protective equipment are provided to prevent, so far as is reasonably practicable, risk of accidents or of adverse effects to health.

Human Rights:

10. Human Rights: It is expected that contractors support and respect the protection of internationally proclaimed human rights and to ensure that they are not complicit in human rights abuses.

11. Harassment, Harsh or Inhumane Treatment: It is expected that contractors create and maintain an environment that treats all employees with dignity and respect. It is further expected that contractors, as well as their parent, subsidiary and affiliated entities along with any subcontractors, will neither use or engage in, nor allow their employees or other persons engaged by them to use or engage in, any: threats of violence, verbal or psychological harassment or abuse, and/or sexual exploitation and abuse. Sexual exploitation and abuse violate universally recognized international legal norms and standards and are unacceptable behaviour and prohibited conduct. Prior to entering into agreements, contractors are informed of the standards of conduct with respect to the prohibition of sexual exploitation and abuse, expected. Such standards include, but are not limited to, the prohibition of: (i) engaging in any sexual activity with any person under the age of 18, regardless of any laws of majority or consent, (ii) exchanging any money, employment, goods, services, or other things of value, for sex, and/or (iii) engaging in any sexual activity that is exploitive or degrading to any person. It is expected that contractors take all appropriate measures to prohibit their employees or other persons engaged by the suppliers, from engaging in sexual exploitation and abuse. It is also expected that contractors create and maintain an environment that prevents sexual exploitation and abuse. Contracts will contain provisions concerning a supplier´s obligation to take appropriate measures to prevent sexual exploitation and abuse. The failure by a supplier to take preventive measures against sexual exploitation or abuse, to investigate allegations thereof, or to take corrective action when sexual exploitation or abuse has occurred, constitute grounds for termination of any agreement. Moreover, no harsh or inhumane treatment coercion or corporal punishment of any kind is tolerated, nor is there to be the threat of any such treatment.

12. Mines: It is expected that contractors do not to engage in the sale or manufacture of antipersonnel mines or components utilized in the manufacture of anti-personnel mines.

Environment:

13. Environmental: It is expected that contractors have an effective environmental policy and to comply with existing legislation and regulations regarding the protection of the environment. Suppliers should wherever possible support a precautionary approach to environmental matters, undertake initiatives to promote greater environmental responsibility and encourage the diffusion of environmentally friendly technologies implementing sound life-cycle practices.

14. Chemical and Hazardous Materials: Chemical and other materials posing a hazard if released into the environment are to be identified and managed to ensure their safe handling, movement, storage, recycling or reuse and disposal.

15. Wastewater and Solid Waste: Wastewater and solid waste generated from operations, industrial processes and sanitation facilities are to be monitored, controlled and treated as required prior to discharge or disposal.

16. Air Emissions: Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterized, monitored, controlled and treated as required prior to discharge or disposal

17. Minimize Waste, Maximize Recycling: Waste of all types, including water and energy, are to be reduced or eliminated at the source or by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.

Ethical conduct:

18. Corruption: It is expected that contractors adhere to the highest standards of moral and ethical conduct, to respect local laws and not engage in any form of corrupt practices, including but not limited to extortion, fraud or bribery.

19. Conflict of Interest: It is expected that contractors disclose any situation that may appear as a conflict of interest and disclose if any official or professional under contract may have an interest of any kind in the supplier's business or any kind of economic ties with the supplier.

20. Gifts and Hospitality: No invitations to sporting or cultural events should be accepted, offers of holidays or other recreational trips, transportation, or invitations to lunches or dinners. It is expected that contractors do not offer any benefit such as free goods or services, employment or sales opportunity to staff members in order to facilitate the contractors´ business with the Project entities.

21. Post-employment restrictions: Post-employment restrictions may apply to staff in service and former staff members who participated in the procurement process, if such persons had prior professional dealings with suppliers. Contractors are expected to refrain from offering employment to any such person for a period of one year following separation from service.