



FEDERAL REPUBLIC OF SOMALIA

MINISTRY OF LABOR & SOCIAL AFFAIRS

**SOMALIA SHOCK-RESPONSIVE SAFETY NET FOR HUMAN
CAPITAL PROJECT**

**Fourth Additional Financing (P181469)
(Updated)**

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

Negotiated Version

27th August 2025

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Federal Republic of Somalia (Recipient) will implement the Shock Responsive Safety Net for Human Capital Project (the Project), with the involvement of the Ministry of Labor & Social Affairs (MoLSA), as set out in the (a) financing agreement between the Recipient and the International Development Association (the Association) dated August 20, 2019 (the Original Financing Agreement) as amended; (b) financing agreement between the Recipient and the Association, dated June 27, 2021 (the First Additional Financing Agreement) as amended; (c) the financing agreement between the Recipient and the Association, dated July 6, 2022 (the Second Additional Financing Agreement); (d) the financing agreement between the Recipient and the Association, dated December 22, 2023 (the Third Additional Financing Agreement); and the (d) grant agreement between the Recipient and the Association, acting as administrator of the Somalia Multi Partner Fund 2 (Grant Agreement) (the Grant Agreement, together with the Original Financing Agreement, First Additional Financing Agreement, Second Additional Financing Agreement and Third Additional Financing Agreement, shall hereinafter be referred to as “Agreements”). The Association has agreed to provide financing for the Project, as set out in the Agreements referred to above. This Environmental and Social Commitment Plan (ESCP) supersedes previous versions of the ESCP for the Project and shall apply to the financings under the Agreements for the Project referred to above. MoLSA has contracted the World Food Programme (WFP) and the United Nations Children’s Fund (UNICEF) to support the implementation of the parent project. The International Development Association (the Association) has agreed to provide financing for the Project.
2. The Recipient shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Association. The ESCP is a part of the Agreements. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the Agreements.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Recipient shall carry out or cause to be carried out, including, as applicable, the timeframes of the actions and measures, institutional, staffing, training, monitoring, and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, in form and substance, and in a manner acceptable to the Association. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the Association. As provided for under the referred Agreements, the Recipient shall ensure that there are sufficient funds available to cover the of implementing the ESCP.
4. As agreed by the Association and the Recipient, this ESCP will be revised from time to time if necessary, during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the Association and the Recipient agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and Project Manager of MoLSA. The Federal Republic of Somalia shall promptly disclose the updated ESCP.
5. The subsection on “Indicators for Implementation Readiness” below identifies the actions and measures to be monitored to assess Project readiness to begin implementation in accordance with this ESCP. Nevertheless, all actions and measures in this ESCP shall be implemented as set out in the “Timeframe” column below irrespective of whether they are listed in the referred subsection.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT			
A	<p>ORGANIZATIONAL STRUCTURE</p> <p>Maintain a Project Implementation Unit (PIU) with qualified staff and resources to support management of ESHS risks and impacts of the Project including a Social Development Specialist, GBV Specialist, an Environmental Specialist and Grievance Redress Operators</p> <p>Mobilize additional staff on short-term or long-term assignment in accordance with ESMF institutional assessment/needs, including subject matter specialists on GBV/SEA, labor conditions (health & safety), and social inclusion, as necessary to ensure that the Project is implemented in accordance with the ESSs and this ESCP.</p>	<p>Maintain the existing PIU throughout Project implementation.</p> <p>Timeframe as agreed with the Association and specified in the Project Operations Manual.</p>	MoLSA PIU
B	<p>The following training sessions have been conducted and shall continue under the Project as required.</p> <ul style="list-style-type: none"> • Environmental and Social Awareness training in the ESF • E&S focal points will require training on their obligations under the ESMF and reporting. • NGOs contracted to WFP: • Stakeholder mapping and engagement • Obligations under the ESMF • Obligations for reporting incidents to the Association • Labor management procedures • Gender Based Violence awareness and accountability training • Emergency preparedness and response 	Training to continue throughout Project implementation	MoLSA PIU
MONITORING AND REPORTING			
C	<p>REGULAR REPORTING</p> <p>Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&S instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism(s)</p>	<p>Submit quarterly reports to the Association throughout the first year of Project implementation commencing after the Effective Date and biannually thereafter throughout Project implementation. Submit each report to the Association no later than 21 days after the end of each reporting period.</p>	MoLSA PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
D	CONTRACTOR'S MONTHLY REPORTS	Submit the monthly reports to the Association as annexes to the reports to be submitted under action C above.	MoLSA PIU
E	<p>INCIDENTS AND ACCIDENTS</p> <p>Promptly notify any incident or accident related or having an impact on the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers. Provide sufficient details regarding the incident or accident, indicating immediate measures taken to address it, and include information provided by any contractor and supervising entity, as appropriate, following such classification and reporting guidance as the Association may provide.</p> <p>Subsequently, at the Association's request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.</p> <p>Report on all other incidents to the Association in quarterly reports.</p>	<p>Notify the Association within 48 hours of learning of an incident or accident.</p> <p>Provide subsequent report within a timeframe acceptable to the Association.</p> <p>Quarterly and maintained throughout Project implementation</p>	MoLSA PIU
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</p> <p>Adopt and implement an Environmental and Social Management Framework (ESMF), Labor Management Procedures (LMP), SEA/SH Prevention and Response Action Plan (SEA/SH PRAP), Security Risk Assessment Management Framework (SRAMF), and E-Waste Management Plan (EWMP) that were prepared pursuant to the third additional financing under the Third Additional Financing Agreement (AF3) for the Project consistent with the relevant ESSs.</p>	Maintain and implement the ESMF, LMP, SEA/SH-PRAP, and SRAMF, and EWMP that were prepared, consulted upon, disclosed and adopted under AF3. throughout the Project	MoLSA PIU
1.2	<p>MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&S instruments, the Labor Management Procedures (LMP), and code of conduct, into the ESHS specifications of the procurement documents and contracts with contractors.</p> <p>Thereafter ensure that the contractors comply and cause subcontractors to comply with the ESHS specifications of their respective contracts. The contracts shall include penalties for noncompliance of ESHS requirements and specifications.</p>	<p>Prior to the engagement of contractors and maintained throughout project implementation.</p> <p>Supervise contractors throughout Project implementation.</p>	MoLSA PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.3	<p>TECHNICAL ASSISTANCE</p> <p>Ensure that the consultancies, studies (including feasibility studies, if applicable), capacity building, training, and any other technical assistance activities under the Project are carried out in accordance with terms of reference acceptable to the Association that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.</p>	Throughout Project implementation.	MoLSA PIU
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Adopt and implement the Labor Management Procedures (LMP) for the Project, including, inter alia, provisions on working conditions, management of workers relationships, occupational health and safety (including personal protective equipment, and emergency preparedness and response), code of conduct (including relating to SEA and SH), forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms.</p>	Adopted the updated LMP in a similar timeframe as 1.2	MoLSA PIU
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.</p>	GRM for the parent Project is operational and will continue being implemented under the fourth additional financing under the Grant Agreement (AF 4) and throughout the Project implementation.	MoLSA PIU
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>MANAGEMENT OF WASTE AND HAZARDOUS MATERIALS:</p> <p>As part of the ESMF, develop and implement measures and procedures for managing waste and hazardous materials.</p>	Adopted the Waste Management Plan and will continue being implemented under the AF 4 and throughout the Project implementation	
3.2	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p> <p>Ensure that any waste generated by the Project is managed in accordance with ESS3. In particular, ensure that e-waste is segregated from other forms of waste and is taken to licensed refurbishes, collection centers or recyclers. Where applicable, procurement procedures shall consider the possibility of refurbishment as part of the selection process for procurement of computers. These procedures shall be included in the Project Operations Manual.</p>	E-waste management measures have been included in the Project Operations Manual, to be maintained throughout Project implementation	MoLSA PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	COMMUNITY HEALTH AND SAFETY Assess and manage specific risks and impacts to the community arising from Project activities and include mitigation measures in the Environmental and Social Management Framework (ESMF)	In a similar timeframe as 1.1. Maintained throughout Project implementation.	MoLSA PIU
4.2	SEA AND SH RISKS Adopt and implement a SEA/SH Action Plan as part of the ESMF, to assess and manage the risks of SEA and SH.	Adopted the SEA/SH Action Plan in a similar timeframe as 1.1. Maintained throughout Project implementation.	MoLSA PIU
4.3	SECURITY MANAGEMENT Assess and implement measures to manage the security risks of the Project, including the risks of engaging security personnel to safeguard project workers, sites, assets, and activities in the Security Risk Assessment Management Framework (SRAMF) , guided by the principles of proportionality and GIIP, and by applicable law, in relation to hiring, rules of conduct, training, equipping, and monitoring of such personnel	Adopted the SRAMF in a similar timeframe as 1.1. Maintained throughout Project implementation.	MoLSA PIU
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	BIODIVERSITY RISKS AND IMPACTS ESS 6 is not currently relevant.		
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	ESS 7 is not currently relevant		
ESS 8: CULTURAL HERITAGE			
8.1	CULTURAL HERITAGE RISKS AND IMPACTS ESS 8 is not currently relevant.		
ESS 9: FINANCIAL INTERMEDIARIES			
9.1	ESS 8 is not currently relevant		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION Adopt and implement a Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, which shall include measures to, inter alia, provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.	The SEP for SNHCP was updated and redisclosed on 21 December 2023 and will be maintained throughout Project implementation	MoLSA PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>Establish, publicize, maintain, and operate an accessible grievance mechanism, to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10.</p> <p>The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.</p>	Project Grievance Mechanism established and enhanced under the AF3, will be maintained throughout Project implementation	MoLSA PIU
INDICATORS FOR IMPLEMENTATION READINESS			
The following actions are indicators for implementation readiness: N/A			