

Somalia Urban Resilience Project Phase II

(P170922)

Additional Financing

(P178887)

And

Second Additional Financing

(P179775)

Borrower

Ministry of Finance, Federal Republic of Somalia

Project Implementing Entity

Benadir Regional Administration/Mogadishu Municipality

Garowe Municipality/Puntland

Baidoa Municipality/South West State

Kismayo Municipality/Jubbaland

Dhuusamareeb Municipality/Galmudug State

Beledweyene Municipality/Hirshabelle State

Ministry of Public Works, Reconstruction and Housing

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

Draft for Negotiation

November 2022

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Federal Government of Somalia (FGS) will implement the Somalia Urban Resilience Project Phase II (P170922), the Additional Financing (AF1) (P178887) and the Second Additional Financing (AF2) (P179775) (the **Project**), with the involvement of the following Project Implementing Entities: Municipalities of Mogadishu, Garowe, Baidoa, Kismayo, Dhuusamareeb and Beledweyne, and Ministry of Public Works, Reconstruction and Housing. The International Development Association (hereinafter the **Association**) has agreed to provide financing for the Project. This Environmental and Social Commitment Plan (**ESCP**) supersedes previous versions of the ESCP for the Project and shall apply both to the original and the additional financing for Project referred to above.
2. The FGS will implement material measures and actions so that the Project is implemented in accordance with the Environmental and Social Standards (**ESSs**). This ESCP sets out material measures and actions, any specific documents or plans, as well as the timing for each of these.
3. The FGS will also comply with the provisions of any other Environmental and Social (E&S) documents and the timelines specified in those E&S documents required under the Environmental and Social Framework (ESF) and referred to in this ESCP, which include:
 - I. The updated version (April 2022) of the following E&S framework documents: Environmental and Social Management Framework (ESMF), Resettlement Policy Framework (RPF), Stakeholder Engagement Framework (SEF) and the Labor Management Procedures (LMP), which have been prepared for SURP II and the AFs;
 - II. Environmental and Social Management Plans (ESMPs), Resettlement Action Plans (RAPs), Stakeholder Engagement Plan (SEPs), Labor Management Procedures (LMPs) and Security Management Plans (SMPs), which have been/will be prepared for each subproject of SURP II and the AFs; and
 - III. The ESMF for Component 4: Support for Urban Forced Displacement (which was renamed from the "CERC-ESMF" (June 2022) and updated to incorporate the AF2), and any E&S documents which may be required for activities under Component 4.
4. The FGS is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the municipalities referenced in 1. above.
5. Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the Association by the FGS as required by the ESCP and the conditions of the legal agreement, and the Association will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
6. As agreed by the Association and the FGS, this ESCP may be revised from time to time during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to assessment of Project performance conducted under the ESCP itself. In such circumstances, the FGS will agree to the changes with the Association and will update the ESCP to reflect such changes. Agreement on changes to the ESCP will be documented through the exchange of letters signed between the Association and the FGS. The FGS will promptly disclose the updated ESCP.
7. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, the FGS shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <ul style="list-style-type: none"> 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 documents required under the ESCP, such as stakeholder engagement activities, inclusion of vulnerable groups, labor and working conditions, GBV mitigations and functioning of the grievance mechanism(s). Prepare and submit to the Association corrective action reports to address the findings of the third-party monitoring (TPM) agent 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 documents required under the ESCP, such as stakeholder engagement activities, inclusion of vulnerable groups, labor and working conditions, GBV mitigations and functioning of the grievance mechanism(s). 	<ul style="list-style-type: none"> Regular Reporting: Quarterly throughout project implementation TPM: Throughout project implementation 	<ul style="list-style-type: none"> Project Implementation Unit (PIU) of each municipality and consolidated by the federal-level Project Coordination Unit (PCU)
B	<p>INCIDENTS AND ACCIDENTS</p> <ul style="list-style-type: none"> Promptly notify the Association of any incident or accident related to 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 detail regarding the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and supervising entity, as appropriate. Subsequently, as per the Association's request, prepare a report on the incident or accident and propose any measures to prevent its recurrence. 	<ul style="list-style-type: none"> Within 48 hours after taking notice of the incident or accident 	<ul style="list-style-type: none"> PIU of each municipality with support of the PCU
C	<p>CONTRACTORS MONTHLY REPORTS</p> <ul style="list-style-type: none"> As per the Association's request, provide the contractor's monthly monitoring reports submitted to the PIU. 	<ul style="list-style-type: none"> Immediately upon request by the Association 	<ul style="list-style-type: none"> PIU of each municipality
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <ul style="list-style-type: none"> PIU of each municipality: Establish and maintain an organizational structure with qualified staff and resources to support management of E&S risks, at least one full-time environmental and social safeguards specialist. Other relevant staff will include project coordinator, finance specialist, procurement specialist, community engagement officer, engineer and monitoring and evaluation specialist. 	<ul style="list-style-type: none"> All PIUs are fully staffed as of October 2022. Staff turnover shall be filled on an ongoing basis. 	<ul style="list-style-type: none"> PIU of each municipality and federal level PCU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<ul style="list-style-type: none"> Federal-level PCU: Establish and maintain an organizational structure with qualified staff and resources to support management of E&S risks, at least one full-time environmental and social safeguards specialist and one gender-based violence (GBV)/gender specialist. Other relevant staff will include project coordinator, procurement specialist, financial management specialist, and other technical specialists as deemed relevant. 	<ul style="list-style-type: none"> PCU: Fully staffed as of October 2022. Staff turnover shall be filled on an ongoing basis. 	
1.2	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENT AND MANAGEMENT PLAN</p> <ul style="list-style-type: none"> Consistent with the Project’s ESMF and relevant ESSs, prepare, disclose and implement ESMPs for subprojects, in a manner acceptable to the Association (the environmental and social risk management for Component 4 is provided under Commitment 1.6 below). Consistent with the Project’s E&S framework documents, ensure that the E&S screening process screens out excluded activities in environmentally sensitive areas such as biodiversity hotspots, among others. 	<ul style="list-style-type: none"> Obtain prior review and approval of the ESMP by the Association and disclose before commencement of civil works of respective subproject. Carry out the ESMP throughout Project implementation. 	<ul style="list-style-type: none"> PIU of each municipality
1.3	<p>MANAGEMENT OF CONTRACTORS</p> <ul style="list-style-type: none"> Selection of contractors: Ascertain that the contractors are legitimately registered entities under the relevant national statutory provisions and have the capacity to comply with the relevant requirements under the LMP. Contractual provisions and non-compliance remedies: For each subproject, incorporate the relevant aspects of the ESCP, ESMP and the LMP, into the ESHS specifications of the procurement documents (including code of conduct on GBV and Occupational Health and Safety (OHS) measures) with contractors, together with non-compliance remedies. Performance monitoring: Monitor the performance of the contractors to ensure that they comply with the ESHS specifications of their respective contracts in accordance with the LMP. 	<ul style="list-style-type: none"> Prior to the preparation of procurement documents. Supervise contractors throughout Project implementation. 	<ul style="list-style-type: none"> PIU of each municipality

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>1.4 EXPANSION OF THE PROJECT TO OTHER MUNICIPALITIES</p> <ul style="list-style-type: none"> If the project is expanded to cover other municipalities at any future time, review, update and redisclose the environmental and social framework documents of the Project (ESMF, RPF, SEF and LMP). 	<ul style="list-style-type: none"> Obtain prior review and approval of the updated environmental and social framework documents (ESMF, RPF, SEF and LMP) by the Association and disclose before appraisal of the AF. 	<ul style="list-style-type: none"> The PCU
<p>1.5 TECHNICAL ASSISTANCE ACTIVITIES CONSISTENT WITH THE ESF</p> <ul style="list-style-type: none"> The technical assistance to be provided under Component 2 of the Project on “Displacement”, “Operations and Maintenance (O&M) of Urban Infrastructure” and “Urban Governance and Services” shall be undertaken pursuant to terms of reference reviewed and approved by the Association. Such terms of reference shall ensure that the TA takes into account, and calls for application of relevant provisions of ESSs and the borrower’s own laws relating to the environmental and social aspects. 	<ul style="list-style-type: none"> Obtain prior review and approval by the Association to terms of reference of TA activities. 	<ul style="list-style-type: none"> PIU of each municipality or PCU, depending on the jurisdiction.
<p>1.6 ENVIRONMENTAL AND SOCIAL RISK MANAGEMENT FOR COMPONENT 4: SUPPORT FOR URBAN FORCED DISPLACEMENT</p> <ul style="list-style-type: none"> Ensure that the ESMF for Component 4 (which was renamed from the “CERC-ESMF” (June 2022) and updated to incorporate the AF2) includes a description of the E&S risk management arrangements for the implementation of the activities under Component 4, in accordance with the ESSs. Incorporate the relevant aspects of the ESMF for Component 4 and the ESSs into the Output Agreement with International Organization for Migration (IOM). Cause the IOM, their implementing partners and contractors/subcontractors to comply with the ESHS specifications of their respective agreements and contracts and inclusion of vulnerable groups in project benefits and stakeholder engagement activities, as per the ESMF for Component 4 and any E&S instruments which may be required for activities under Component 4. Prepare and submit to the Association regular monitoring reports on the activities under Component 4, including on the E&S risk management, as part of quarterly reporting under Section A of this ESCP. 	<ul style="list-style-type: none"> The adoption of the ESMF for Component 4 in form and substance acceptable to the Association is a withdrawal condition for Component 4 under the financing agreement for the Project. The Output Agreement with relevant E&S provisions shall be concluded in form and substance acceptable to the Association before the start of project activities under Component 4. Any required E&S instrument shall be adopted and included as part of the respective bidding process, if applicable, and in any case, before the carrying out of the relevant 	<ul style="list-style-type: none"> The PCU with support of PIUs of Mogadishu, Garowe and Baidoa.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
		<p>Project activities for which the E&S instrument is required.</p> <ul style="list-style-type: none"> The E&S instruments shall be implemented in accordance with their terms, throughout Project implementation. 	
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES (LMP)</p> <ul style="list-style-type: none"> Consistent with the Project’s LMP and ESS2, develop and implement labor management procedures for subprojects to address labor risks, including (but not limited to) occupational, health and safety (OHS); prevention of child and forced labor including age verification upon hiring and maintenance of labor registry; management of security risks to project workers; emergency preparedness and response; Grievance Redress Mechanism (GRM) for project workers; training of project workers on key issues including OHS and GBV prevention; and preferential hiring of local workforce and management of labor influx. 	<ul style="list-style-type: none"> Obtain prior review and approval of the LMP by the Association and disclose prior to the preparation of procurement documents. Carry out the LMP throughout Project implementation. 	PIU of each municipality
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p> <ul style="list-style-type: none"> Consistent with the Project’s ESMF and ESS3, prepare, disclose and implement site-specific ESMPs for subprojects, including resource efficiency measures, managing possible gaseous emissions, and solid and liquid effluents, in a manner acceptable to the Association. For Component 4 including WASH, health and Housing, Land and Property (HLP) activities, address E&S risks and impacts relevant to ESS3 consistent with the ESMF for Component 4 (the environmental and social risk management processes for Component 4 is provided under Commitment 1.6 above). 	<ul style="list-style-type: none"> Obtain prior review and approval of the ESMPs by the Association and disclose before commencement of civil works of respective subproject. Carry out the ESMPs throughout Project implementation. 	<ul style="list-style-type: none"> PIU of each municipality
ESS 4: COMMUNITY HEALTH AND SAFETY			

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>4.1 COMMUNITY HEALTH AND SAFETY</p> <ul style="list-style-type: none"> Consistent with the Project’s ESMF and ESS4, prepare, disclose and implement site-specific ESMPs for subprojects which include mitigation measures to address community health and safety risks, including traffic and road safety, in a manner acceptable to the Association. For Component 4 including WASH health and HLP activities, address E&S risks and impacts relevant to ESS4 consistent with the ESMF for Component 4 (the environmental and social risk management processes for Component 4 is provided under Commitment 1.6 above). 	<ul style="list-style-type: none"> Obtain prior review and approval of the ESMPs by the Association and disclose before commencement of civil works of respective subproject. Carry out the ESMPs throughout Project implementation. 	<ul style="list-style-type: none"> PIU of each municipality

<p>4.2</p>	<p>MANAGEMENT OF GBV AND SEA/SH RISKS</p> <ul style="list-style-type: none"> • Develop and implement measures and actions to assess and manage the risks of sexual exploitation and abuse (SEA), Sexual Harassment (SH) as well as other forms of GBV. This includes: <ul style="list-style-type: none"> ➢ Hiring of a GBV Specialist in the PCU for the project implementation and monitoring (hired as of November 2022); ➢ Implementation of the stand-alone SEA/SH Prevention and Response Action Plan prepared for the project (the Action Plan under implementation as of November 2022). Key measures include: <ol style="list-style-type: none"> 1) Codes of conduct (CoC) for project workers; and plan for sensitization/awareness raising for the community and intended training activities for workers on CoC and SEA provisions; (Development of CoC completed and under implementation including signing and training is ongoing as of November 2022) 2) Mapping and partnership with identified GBV service providers; (Completed under the parent project as of November 2022 but additional locations under component 4 to be updated) 3) A Reporting and Response Framework that outlines key requirements for reporting cases if they arise and measures to enable safe, ethical, survivor-centered response; (Completed under the GRM manual and implementation ongoing as of November 2022) 4) An Accountability Framework that outlines how the PIU/contractor will handle allegations, including related to investigation (in alignment with national processes) and sanctions for potential perpetrators. (Completed under the GRM manual and the implementation ongoing as of November 2022) 5) Establishment of special channel/procedures for safe, confidential reporting of GBV incidence that connect to the project GRM and enable training of GRM operators on how to respond to cases that come forward. (Under implementation in municipalities where the civil work contractor is engaged as of November 2022) ➢ Development of additional protection measures to address potential sexual harassment in recruitment practices and in the workplace (under implementation in municipalities where the civil work contractor is engaged as of November 2022). ➢ Clarification of GBV requirements in bidding documents (including requirements for CoCs, training of workers, and how GBV related costs will be 	<ul style="list-style-type: none"> • For hiring of a GBV Specialist in the PCU, see commitment 1.1. “ORGANIZATIONAL STRUCTURE.” (Hired since August 2021) • Obtain prior review and approval of mitigation measures for GBV by the Association, which will be integrated into environmental and social instruments and bidding documents prior to commencement of civil works. • Carry out the mitigation measures as early as possible, and throughout Project implementation. 	<ul style="list-style-type: none"> • PIU of each municipality
------------	---	--	--

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>covered in the contract); bid evaluation to include consideration for GBV response proposal (under implementation as of November 2022).</p> <ul style="list-style-type: none"> ➤ Identification of a Third-Party Monitoring to track implementation and management of GBV risks (TPM under preparation as of November 2022). ➤ Enabling additional funds available to implement measures to address GBV and SEA risks and impacts that may arise during Project implementation (Relevant funds incorporated in BOQs as of November 2022. No additional funds required to date). 		
<p>4.3 SECURITY RISK MANAGEMENT</p> <ul style="list-style-type: none"> • In line with ESS4 and WB Good Practice Note on “Assessing and Managing the Risks and Impacts of the Use of Security Personnel”, develop and implement SMPs for each subproject. 	<ul style="list-style-type: none"> • Obtain prior review and approval of the SMP by the Association before commencement of civil works of respective subproject. • Carry out the SMP throughout Project implementation. 	<ul style="list-style-type: none"> • PIU of each municipality
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT		
<p>5.1 RESETTLEMENT ACTION PLAN (RAP)</p> <ul style="list-style-type: none"> • Consistent with the Project’s RPF and ESS5, develop and implement the RAPs for subprojects. 	<ul style="list-style-type: none"> • Obtain prior review and approval of the RAP by the Association and disclose and implement prior to commencing Project activities that involve land acquisition and resettlement. 	<ul style="list-style-type: none"> • PIU of each municipality
<p>5.2 FORCED DISPLACEMENT PRIOR TO PROJECT APPROVAL</p> <ul style="list-style-type: none"> • If forced displacement (or land acquisition or land use restrictions) was conducted in the Right of Way (ROW) of project roads (or any other project-financed infrastructure) before board approval of the Project (SURP II) and after March 31 2019 (which is the official start date of SURP’s civil works), relevant ESS5 requirements will be applied retroactively. If such requirements cannot be satisfied retroactively, the Bank will not support such roads (or any other infrastructure). • For Component 4, the IDP site development will be conducted on the land secured by the government, which will be subject to prior screening to confirm the consistency with ESS5, the ESMF for Component 4 and the SURP II Resettlement Policy Framework (RPF, updated in April 2022). The outcome of the screening and the evidence of landownership will be documented in site-specific E&S instruments and reviewed by the Bank. 	<ul style="list-style-type: none"> • Identification of such prior forced displacement when conducting screening and census survey during the RAP process of subprojects. <p>Prepare and disclose site-specific E&S instruments before the carrying out of the relevant Project activities for which the E&S instrument is required.</p>	<ul style="list-style-type: none"> • PIU of each municipality

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	<p>BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</p> <ul style="list-style-type: none"> Consistent with the Project’s ESMF, ensure that the E&S screening process screens out excluded activities in environmentally sensitive areas such as biodiversity hotspots, among others. Consistent with the Project’s ESMF and ESS6, prepare, disclose and implement site-specific ESMPs for subprojects, including managing impacts on living natural resources, and modified/ natural/ critical habitats, in a manner acceptable to the Association. 	<ul style="list-style-type: none"> Obtain prior review and approval of the ESMPs by the Association and disclose before commencement of civil works of respective subproject. Carry out the ESMPs throughout Project implementation. 	<ul style="list-style-type: none"> PIU of each municipality
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
Not relevant to the Project. The identification and mitigation measures for vulnerable groups other than those to be covered under ESS7 are addressed in the ESS1 and ESS10 sections.			
ESS 8: CULTURAL HERITAGE			
8.1	<p>CULTURAL HERITAGE</p> <ul style="list-style-type: none"> Consistent with the Project’s ESMF and ESS8, prepare, disclose and implement site-specific ESMPs for subprojects, in a manner acceptable to the Association. Chance Finds: Prepare, adopt and implement the chance finds procedures described in the subproject site-specific ESMPs. 	<ul style="list-style-type: none"> Obtain prior review and approval of the ESMPs by the Association and disclose before commencement of civil works of respective subproject. Carry out the ESMPs throughout Project implementation. 	<ul style="list-style-type: none"> PIU of each municipality
ESS 9: FINANCIAL INTERMEDIARIES			
Not relevant to the Project.			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN (SEP)</p> <ul style="list-style-type: none"> Consistent with the Project’s SEF and ESS10, prepare, disclose and implement the SEP for subprojects, including the Project GRM. 	<ul style="list-style-type: none"> Obtain prior review and approval of the SEP by the Association and disclose prior to commencement of civil works. 	<ul style="list-style-type: none"> PIU of each municipality
Capacity Support (Training)			
CS1	<p>Training topics to be provided will include the following:</p> <ul style="list-style-type: none"> The World Bank ESF in general; Labor and OHS issues (such as OHS measures in construction and traffic safety); Preparation of environmental and social instruments, including ESMPs, RAPs, SEPs, LMPs and SMPs; GBV; Resettlement; 	<ul style="list-style-type: none"> Ongoing throughout the Project implementation with support from the Association. 	<ul style="list-style-type: none"> PIU of each municipality and the PCU

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<ul style="list-style-type: none"> • GRM; • Contractor management; • EHS risks management for Component 4 (including WASH, health and HLP activities); and • Preparation and implementation of site-specific ESMPs for Component 4. <p>Targeted groups will include the following:</p> <ul style="list-style-type: none"> • PIU of each municipality; • Federal level PCU; • Civil servants in municipal, state and federal governments; • Engineering and supervision consultants; • Contractors/subcontractors and their project workers; • Third party monitor; • Affected communities; and • The IOM and their implementing partners for Component 4 		