Appraisal Environmental and Social Review Summary

Appraisal Stage

(ESRS Appraisal Stage)

Date Prepared/Updated: 05/19/2020 | Report No: ESRSA00845
BASIC INFORMATION

A. Basic Project Data

<table>
<thead>
<tr>
<th>Country</th>
<th>Region</th>
<th>Project ID</th>
<th>Parent Project ID (if any)</th>
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<tbody>
<tr>
<td>Somalia</td>
<td>AFRICA</td>
<td>P174065</td>
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Project Name

Shock Responsive Safety Net for Locust Response Project

Practice Area (Lead)

Social Protection & Jobs

Financing Instrument

Investment Project Financing

Estimated Appraisal Date

5/14/2020

Estimated Board Date

6/17/2020

Borrower(s)

Federal Republic of Somalia

Implementing Agency(ies)

Ministry of Labor and Social Affairs

Proposed Development Objective(s)

The Project Development Objective is to protect food security and livelihoods of poor and vulnerable households affected by the locust outbreak.

Financing (in USD Million)

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<th>Amount</th>
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<tbody>
<tr>
<td>Total Project Cost</td>
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B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?

No

C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]

The proposed Shock Responsive Safety Net for Locust Response Project (SNLRP) is a US$ 40 million IDA grant to be implemented over 2 years with the aim of responding to the threat to livelihoods and food security posed by the locust outbreak in Somalia through the provision of emergency cash transfers to targeted poor and vulnerable households. The proposed project will have two components, namely: i) Emergency Cash Transfers; and ii) Project Management and Monitoring and Evaluation. Component 1 will provide time-bound emergency cash transfers to approximately 100,000 affected poor and vulnerable households, 35,000 of which are expected to be existing safety net beneficiaries under the on-going World Bank-funded Somalia Shock Responsive Safety Net for Human Capital Project (SNHCP, P171346). The remaining households will be in new areas not previously targeted by the SNHCP. The
The proposed project will be implemented by the Ministry of Labor and Social Affairs (MoLSA) across Somalia and would focus primarily on rural districts with severe locust infestation. Implementation of Component 1 will continue to benefit from the existing arrangement between MoLSA and the World Food Programme (WFP) under the SNHCP for the delivery and administration of the cash transfer activities, using the same delivery arrangements and systems. Component 2 will support the management and administration of the project.

D. Environmental and Social Overview

D.1. Detailed project location(s) and salient physical characteristics relevant to the E&S assessment [geographic, environmental, social]

The SNLRP will provide temporary emergency cash transfers to households most severely affected by the locust crisis in the most affected districts of Somalia. Project activities will be implemented in areas of fragility due to endemic poverty, acute drought and protracted conflict and insecurity which may make direct access to beneficiaries challenging. A multi-tiered targeting approach will be adopted with eligibility criteria applied at the district, community, and household level.

District selection is based on the expected risk of exposure of a given district to the desert locust outbreak. The Food Security and Nutritional Analysis Unit (FSNAU) of the Food and Agriculture Organization (FAO) of the United Nations (UN) has identified 43 districts that will be significantly affected by the desert locust infestation. The SNLRP will target all 43 of them. Since locust may not affect the entire district equally, FSNAU has identified specific locust-affected areas within each district.

Component 1 will respond to the threat of the locust outbreak by providing emergency cash transfers to approximately 100,000 poor and vulnerable rural locust-affected households, equivalent to some 600,000 persons. The transfers will be delivered using the delivery system and procedures of the FGS’ Baxnaano program (supported by the World Bank-funded Shock-Responsive Safety Net for Human Capital Project (SNHCP), P171346). MoLSA will strategically partner with WFP to support the implementation of Component 1, governed by a Standard Output Agreement.

There will be two targeting modalities within the locust-affected districts: one for households who are regular Baxnaano and another for households that are not part of the regular Baxnaano program but reside in severely locust affected district and community. Households that are registered for Baxnaano will become automatically eligible for the temporary benefit, provided they reside (a) in a severely locust affected district and (b) in a locust affected community. No additional eligibility criteria will be applied to avoid creating confusion and tensions. All Baxnaano beneficiaries in locust affected districts and communities will receive transfers under the project as top up to their regular benefit under Baxnaano. Benefit amount under Baxnaano is limited to US$ 20/household/month and accounts for approximately 30% of the average minimum expenditure basket (MEB) for food. Under the SNLRP, these households will receive a cash top up of US$ 40/household/month for a six month period, totaling US$ 60/household/month for locust response, representing about 80% of the average MEB for food.

For non-Baxnaano households, at the community level, rural communities that are not part of the Baxnaano catchment areas but have been identified as severely locust-affected will also be eligible for the emergency cash transfer. A non-Baxnaano household is eligible for the temporary benefit if it is selected through the community-based targeting (CBT) process. The CBT process is undertaken by the community beneficiary selection committees,
consistent with Baxnaano’s standard approach, but is facilitated by WFP’s cooperating partners, either local or international NGOs. The CBT process will be further guided by a specific set of eligibility criteria consistent with the objective of reaching households affected by the locust infestation. Community committees will be instructed to select beneficiaries only from households that meet all of the following criteria: a) household depends on agriculture and livestock for livelihood (small crop or livestock farmers, or agricultural wage workers; b) Locust infestation has had a severe impact on household welfare: only households severely affected by the locust will be eligible, i.e. lost a significant amount of crop or livestock to the locust and/or from the spraying of pesticides when the spraying results in sale/income losses, lost a source of livelihood, was forced to sell assets to subsist during the crisis, and; c) household is very poor. Once selected, these households will receive US$ 60/household/month for a six month period.

In all selected Baxnaano and non-Baxnaano households, the direct beneficiary of the SNLRP transfer will be females, with the exception of cases when adult females are not present.

Component 2 will support the overall management and administration, monitoring of the project implementation, and learning from the experience of the locust response. Project management and administration will be supported by the well-staffed Project Implementation Unit (PIU) of the SNHCP/Baxnaano, housed within MoLSA. Specifically, the PIU will monitor the implementation of the project components and coordinate project activities at the local level. Component 2 will also support additional operational activities linked to the monitoring and management of the SNLRP activities, such as field visits by the PIU and other MoLSA representatives in non-Baxnaano districts, and consultations with FMS representative on relevant aspects of the SNLRP implementation, especially communication, among others.

Contextually, Somalia operates under a complex system in which the way traditional clan and sub-clan dynamics interact with the formal machinery of state is still emerging against a backdrop of recent conflict, poverty and continuing instability. In addition, gender dynamics in Somalia can be restrictive for the target beneficiaries of the project.

Most livelihoods in rural Somalia rely on agriculture or pastoralism. Much of Somalia is arid or semi-arid making the agricultural output of the country marginal in many years. As rains have failed over the last 24 months, much of Somalia is drought affected exacerbating endemic poverty and threatening to undermine recent stability. In addition, impacts of COVID-19 including restrictions on movements has exacerbated challenges in access to beneficiaries for effective consultations and engagements, monitoring of environmental and social impacts and the setting-up and roll-out of grievance redress mechanisms.

D. 2. Borrower’s Institutional Capacity

The implementing agency for the project is the Ministry of Labour & Social Affairs (MoLSA). The PIU created at the federal level for the SNHCP within the SP section of MoLSA will be responsible for the day-to-day management and administration of the project and will report to the Minister of Labor and Social Affairs. The PIU established for the Baxnaano Program will be responsible for managing and monitoring the implementation of the SNLRP components, as well as for the coordination of all project activities at the local level. The PIU includes a Project Manager and SP Coordinator, Operations Officer, Communications Specialist, MIS Specialist, GRM/SRM (Social Risk Management) Specialist, Labor related GRM Specialist, M&E Specialist, Financial Management Specialist, and Procurement Specialist. In addition, Project Liaison Officers are established at the FMS level to support implementation of Baxnaano activities on the ground, as well as coordination with relevant actors at the FMS and local levels. These
Liaison Officers will also support the implementation and coordination of the SNLRP activities on the ground. In addition, a Humanitarian Liaison Officer will be on-boarded to coordinate SNLRP activities with relevant stakeholders, including the Ministry of Humanitarian Affairs and Disaster Management and broader humanitarian partners. Overall, the SNHCP PIU is well-staffed and deemed to be capable of undertaking overall implementation, monitoring and supervision of project activities.

As the client and regional governments has limited capacity to manage E&S risks on a project such as this, the project design relies heavily on a high capacity implementing partner. However, the government will be the recipient of the IDA grant and will sign service contracts with WFP, who has good capacity and existing procedures to implement Component 1 activities. The project will use WFP systems variously for beneficiary selection, development and management of applicant database, social accountability, monitoring, capacity building and grievance redress. The MoLSA, having worked with the WFP in similar interventions has adequate capacity to coordinate project activities. With the implementation of Component 2, MoLSA’s capacity to implement and coordinate E&S risk will be strengthened.

WFP was selected to support the FGS implement the emergency cash transfers (Component 1) given its country-specific and global experience in implementing cash transfers, as well as its existing engagement with MoLSA for the delivery of the Baxnaano Program. WFP is currently delivering cash transfers to selected poor and vulnerable households under the on-going Government-led Baxnaano Program through an Output Agreement with MoLSA. In addition, WFP has a proven track record in effectively implementing cash transfers, including in rural areas in Somalia. It has developed mitigation mechanisms for all the foreseeable project risks and applied them in their standard operating procedures. Central to WFP’s process for managing social risks are detailed requirements for robust and meaningful community consultations and a functioning GRM, which has been in operation and under near continuous evaluation in Somalia for years. In addition, WFP has developed a robust and multi-tiered project monitoring approach, which is required for all their operations in Somalia and will be used on this project. Third-party monitoring (TPM) agencies will also be used to provide independent verification of results.

II. SUMMARY OF ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC)

Environmental Risk Rating

Being predominantly cash transfers, the project will have minimal adverse impacts on the environment. While Component 2, exclusively focused on project management and coordination, will generate some e-waste through the purchase of computers for the FGS, the amount produced is likely to be minimal and the management of the waste a relatively simple matter in Somalia. As such, the project environmental risk is assessed as low.

Social Risk Rating

Component 1 of the project will see unconditional cash transfers issued to women and poor households in rural Somalia. This carries risks of gender-based violence, exclusion, selection bias, elite capture, access to the site for project delivery and monitoring and the possibility of inward migration upsetting the delicate socio political balance of the project area. The primary challenge for the project is ensuring that cash transfers reach the most vulnerable
eligible community members, such as minority groups, people with disabilities, or widows as identified by FSNAU. In addition, gender dynamics in Somalia can be restrictive for women, and the nature of the project could potentially exacerbate GBV by facilitating opportunities for exploitation of vulnerable women. Security risks and difficulty in accessing rural Somalia make effective stakeholder engagement and community participation challenging. Other risks relate to the protection of personal data collected by the project. Given the use of an implementing partner with a strong track record and systems for managing risks, the risks and impacts are considered to be moderate. However, the contextual risks (including security) of operating in a conflict zone with complex social dynamics, where community consultations, oversight and possible variable capacity of implementers to identify, understand and overcome social risks means the risk rating has been increased to substantial.

B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

**Overview of the relevance of the Standard for the Project:**

Key social risks are; exclusion, selection bias, elite capture, access to the site for project delivery and monitoring, GBV/SEAH and the possibility of inward migration upsetting the delicate socio political balance of the project area.

- **Security:** Conflict and insecurity remain persistent challenges in Somalia, and have in the past, impeded delivery of emergency services. Ensuring security for project operations amid armed groups in a region with a recent history of relative lawlessness and the potential for increased conflict due to the locust invasion, will remain a significant challenge. Whereas general insecurity may impact both the project workers and beneficiaries, payment modalities will be entirely through mobile money which eliminates the requirement for armed security necessary while handling cash. Hiring of armed security for project operations is not anticipated but where required, will be done by the cooperating partners using their own systems and modalities as detailed in the SMP.

  Mitigation: By design, the project will only operate in relatively accessible parts of the country, with security of operations and access to site for monitoring and supervision key criteria in the selection of districts for support. Further, the choice of WFP as an implementing partner provides the project access to the UNs system and local capacity for identifying and managing security threats to operations. UNDSS provides overarching security for all UN agencies. In addition, WFP has security officers in all of the regions who oversee the security of the WFP operations. These systems are tried and tested on projects such as this. Moreover, the WFP service agreement with project service providers contains a contractual obligation for the service provider and any contracted security to uphold humanitarian principles such as “do no harm” and to protect beneficiaries (from violence, exploitation and abuse). They also contain an obligation to ensure the security of their own personnel or workers by implementing appropriate risk prevention and mitigation strategies to reduce the likelihood of a harmful event occurring and to mitigate the impact of a security event if it were to occur. WFP have developed a Safe Distribution Guidelines that outline their requirements and provide training to contracted entities in their use. It is estimated that there will be 18-24 cooperating partners each with about 5-6 staff working on the project. This puts the number of non-WFP staff at between 90 and 150.

- **Exclusion:** Security challenges associated with working in rural Somalia (including COVID-19) make effective stakeholder engagement and community participation very challenging. As such, the challenges of ensuring the project reaches vulnerable community members (such as minorities, people with disabilities or widows) present in any cash transfer project are amplified.
Mitigation: Through FSNAU, the project has identified 43 districts that will be significantly affected by the locust infestation. The SNLRP will target all 43 of them. The Baxnaano Program is operational in 14 of them. Since the locust invasion may not affect the entire district equally, FSNAU has identified specific locust-affected areas within each district. To ensure transparency of the CBT process, the list of beneficiaries selected by the community committee will be made public prior to final registration and enrolment in the SNLRP, using the WFP’s SCOPE system. Any objections to the list will be recorded through the project GRM.

- Selection bias and elite/clan capture: The project targets poor and vulnerable households who are affected by the loss of income, livelihood or are at risk of food insecurity due to the locust infestation. As such political, social and cultural dynamics will need to be managed to ensure that the cash transferred is not being captured by spouses, family, nominated caregivers, community leaders or armed groups, but that it instead reaches the intended beneficiaries.

Mitigation: Payments will be made through a mobile money platform whereby cash will be transferred only to those phone numbers whose owner’s ID in the mobile provider’s records match the name registered in SCOPE. In case there is a discrepancy between the ID information of the beneficiary and the data of the mobile payment provider, the mobile payment provider will issue a new SIM card (free of charge). The recipient will then be able to receive transfers only to the account linked to that SIM card with the matched name between registration and SIM card. In addition to collecting identification (including biometric) and household composition data, the eligibility criteria will take into consideration the type of livelihood zone (pastoral, agro-pastoral or riverine), and asset ownership (cattle and land). Cooperating partners and communities will be adequately trained and sensitized on these additional dimensions of the eligibility criteria to effectively undertake beneficiary identification and selection. On the program side, the Baxnaano PIU has a GRM Officer who will coordinate GRM activities with SCOPE’s GRM staff.

- GBV: Closely associated to the selection risks, the project design necessitates effective management of GBV risks. The exchange of sexual favors for registration or transfer of funds, or the spousal abuse to receive cash are the key GBV risks for the project.

Mitigation: The PIU has developed and will implement robust actions to manage the risks of GBV (within households or at payment points), in particular SEA risks, such as sexual favors for registration or release of funds that may extend from receipt of cash transfers by women. The Baxnaano GBV Action Plan, which includes critical measures linked to training and sensitization, response and referral protocols, and accountability procedures to manage cases should they arise, have been expanded to cover the SNLRP activities, and will include all relevant measures for mitigating GBV risks. Indicative measures include outreach to local communities to inform them of risks, raise awareness on reporting mechanisms and to address potential barriers to reporting. Measures will also include expanded identification of GBV services for integration into referral pathways, as well as mandatory signing of a Code of Conduct and associated training on expectations for behavior for relevant partners and project actors responsible for registration and beneficiary authentication, or other key activities linked to the project.

- Difficulty monitoring: Security concerns and the remoteness of the project target areas combine to provide a significant challenge for monitoring and supervising project implementation. This can include challenges for community and stakeholder engagement, grievance redress and other risk mitigation protocols. COVID-19 restrictions are further likely to exacerbate project monitoring challenges.

Mitigation: Under WFP’s practices, except in extreme lifesaving circumstances, can only operate in environments permissible enough to monitor the implementation of their risk management processes. For this project, WFP will use their already established capability for monitoring their operations. WFP have a multifaceted approach to monitoring involving WFP staff, a contracted company that provides staff for monitoring where WFP staff cannot
access, and a complaints hotline. In addition, the World Bank has hired a TPM agency to oversee Baxanano and they will be used to monitor this operation. Where COVID-19 restrictions limit effective community engagements, traditional channels of communications such as TV, newspaper, radio and dedicated phone-lines etc. will be employed.

- Unauthorised access and corruption of personal data- Project activities will see the collection, processing, storage and reproduction of large amount of personal data. Data breaches and hacks can lead to unauthorised access and loss of personal data.

**Mitigation:** Through the use of WFP Data Protection and Privacy Handbook, the project will ensure that standards on handling and processing a large amount of information, including personal data of its beneficiaries and prospective beneficiaries are robust. The Handbook sets out principles for data protection and privacy as set out in the SMP. Once the Government’s capacity to manage the database is in place, and upon formal consent from the beneficiaries, data will be migrated to the government database. While maintaining the database on behalf of the FGS, WFP will apply its established personal data protection and privacy processes that are aligned with the 2017 WFP corporate guideline.

Risks and impacts mitigation measures are detailed in key E&S instruments; a) A Social Management Plan (SMP) (including an Inclusion Plan, security management plan and a GBV-Action Plan). This is the main instrument for managing the social and cultural dynamics in the project and outlines the risk mitigation measures under which the project will operate; b) Stakeholder Engagement Plan (SEP) outlines the obligations of all parties for effective community consultation and grievance redress, and; c) Labor Management Procedures (LMP) to manage the risk of exploitation of and by workers on this project and ensure equity, diversity and transparency in recruitment of project staff and enshrine the requirements of ESS2 in project implementation. All instruments will be prepared, consulted upon and disclosed to prior to conclusion of appraisal and will be in place by commencement of project activities.

Component 2 support overall management and monitoring of project implementation. The project shall ensure that any e-waste generated from project funding is segregated from other forms of waste and is taken to licensed refurbishers, collection centers or recyclers. Details to guide this should be included in the POM. Risks related to worker non-discrimination will be detailed in the SMP.

**ESS10 Stakeholder Engagement and Information Disclosure**

Stakeholder Engagement Plan (SEP) has been prepared which includes: (i) stakeholder identification and analysis; (ii) planning for stakeholder engagement; (iii) consultations and disclosures; (iv) communication and sensitization campaigns; (v) participatory citizen engagements and, (vi) grievance redressal systems. Stakeholders consulted for the production of the SEP are Ministry of Finance, Ministry of Labour & Social Affairs, Ministry of Planning and Economic Development, United Nations World Food Programme, United Nations Children’s Fund, United Nations Food and Agricultural Organization and Development Partners including the European Union, European Civil Protection and Humanitarian Aid Operations, UK Department for International Development (DFID), United States Agency for International Development (USAID) and the governments of Australia, Italy, Sweden and Switzerland. The SEP will consult with female beneficiaries, female non-beneficiaries in the project area, alternate caregivers, beneficiary households, male community members, adjacent communities, and Vulnerable Members of the community (widows, disabled, single women) including minorities, local leaders and local government.
The Grievance Redress Mechanism (GRM) currently in use for similar activities by WFP and under Baxaano is being adopted for the project. The GRM methodology had been reviewed by the Bank and is considered appropriate for the project. As well as allowing for registration of grievances, the GRM makes use of a WFP hotline where complaints are registered and a mechanism for follow up and redress is recorded and reported. Complaints are classified according to their risk level (high, medium, low and residual risk) and are captured in a WFP online case management software. In case of reports of conflict of interest, abuse of power or harassment by project staff, cases are escalated through the Risk Management and Compliance officer. Reports of sexual exploitation and sexual harassment will be referred to WFP PSEA focal points who have appropriate response pathways in place. The Hotline covers all WFP operations in Somalia and as such will resolve complaints about WFP staff, contractors, sub-contractors, and anyone else associated with their operations.

The SEP also draws upon on the experience and expertise of the contracted UN agency, namely WFP, that has a sound understanding of the local context and have existing implementing systems. The client will maintain, and disclose, a documented record of all stakeholder engagement activities. The SEP includes mechanisms for setting out a GRM which would help the beneficiaries/affected individuals to express their concerns and grievances and provide the borrower to address them effectively.

While ensuring compliance with Somalia government COVID-19 social distancing and related requirements, project stakeholder consultation and engagement activities will be designed to be fit for purpose to ensure effective and meaningful consultations to meet project and stakeholder needs. The Project will take a precautionary approach for consultations and other stakeholder engagement to prevent infection and/or contagion, given the highly infectious nature of COVID-19

B.2. Specific Risks and Impacts

A brief description of the potential environmental and social risks and impacts relevant to the Project.

ESS2 Labor and Working Conditions

ESS2 Labor and Working Conditions Project applies to direct project workers, contracted workers including WFP contracted NGO, and Government workers. To ensure recruitment and management of labor on the project is in accordance with ESS2, and LMP has been prepared by the borrower. The LMP ensures that both the PIU and the contracted cooperating partners promote safety and health at work including security measures to protect staff and contracted workers. This includes fair treatment, nondiscrimination and equal opportunity for recruitment of project workers; protection of project workers, including vulnerable workers such as women, persons with disabilities, the elderly and youth as appropriate; prevent the use of all forms of forced labor and child labor and to provide project workers with accessible means to raise workplace concerns.

Labor related grievances will be handled using a separate GRM mechanism other than SCOPE by the Labor GRM Officer that is being hired by MoLSA on a full-time basis. The LMP details a GRM for project workers and in particular those working under WFP contracted NGOs and those under payment merchants, including security officers.
Appropriate occupational health and safety measures (OHS), including any emergency preparedness and response measures necessary, in accordance with the guidelines contained in the Shock-Responsive Safety Net for Human Capital (SNHCP)– Baxnaano Labor Management Procedures will be updated to apply to activities under this project.

The LMP will described the occupational health and safety (OHS) measures applicable to WFP staff under Comp 1.

Prevention measures and emergency responses for different categories of project workers and project-affected parties will be included in the Shock-Responsive Safety Net for Human Capital (SNHCP)– Baxnaano Security Management Plan (SMP), updated to apply to activities under this project.

ESS3 Resource Efficiency and Pollution Prevention and Management

The project will ensure that any e-waste generated from project funding is segregated from other forms of waste and is taken to licensed refurbishers, collection centers or recyclers. Details to guide this will be included in the Project Operations Manual. Where applicable, procurement procedures will integrate the degree of potential for refurbishment into the selection process for procurement of computers. Details to guide this will be included in the Shock-Responsive Safety Net for Human Capital (SNHCP)– Baxnaano Project Operations Manual which will be updated to apply to activities under this project.

ESS4 Community Health and Safety

Gender Based Violence: Closely associated to selection risks noted above, the targeting of women and children as primary beneficiaries necessitates the management of gender-based violence risks. The exchange of sexual favors for registration or transfer of funds, or the spousal abuse to receive cash are key risks for the project.

Mitigation: The PIU will develop and implement robust actions to manage the risks of GBV (within households), in particular sexual exploitation and abuse risks, such as sexual favors for registration that may extend from receipt of cash transfers by women. As articulated above, the Baxnaano GBV Action Plan, which includes critical measures linked to training and sensitization, response and referral protocols, and accountability procedures to manage cases should they arise, will be expanded to cover the SNLRP activities, and will include all relevant measures for mitigating GBV risks. Indicative measures include outreach to local communities to inform them of risks, raise awareness on reporting mechanisms and to address potential barriers to reporting. Measures will also include expanded identification of GBV services for integration into referral pathways, as well as mandatory signing of a Code of Conduct and associated training on expectations for behavior for relevant partners and project actors responsible for registration and beneficiary authentication, or other key activities linked to the project.

Security: Conflict and insecurity remain persistent challenges in Somalia, and have in the past, impeded delivery of emergency services. Ensuring security for project operations amid armed groups in a region with a recent history of relative lawlessness and the potential for increased conflict due to the locust invasion, will remain a significant challenge. This general insecurity may impact both the project workers and beneficiaries.

Mitigation: By design, the project will only operate in relatively accessible parts of the country, with security of operations and access to site for monitoring and supervision key criteria in the selection of districts for support. Moreover, given that payment modalities will be entirely through mobile money, requirement for armed security is
not anticipated. Further, the choice of WFP as an implementing partner provides the project access to the UNs system and local capacity for identifying and managing security threats to operations, as WFP is part of the Security Management System (UNSMS) of the United Nations Organization. The UNSMS Framework for Accountability specifies the responsibilities and accountabilities of United Nations officials and personnel for such measures to enable the conduct of United Nations activities while ensuring the safety, security and well-being of personnel and the security of United Nations premises and assets. The United Nations Department of Safety and Security (UNDSS) provides overarching security for all UN agencies. In addition, WFP has security officers in all of the regions who oversee the security of the WFP operations. These systems are tried and tested on projects such as this. Majority of the cooperating partners that WFP works with are small community-based Local NGOs (LNGOs) that are well-grounded within the local communities. The implementation arrangements with cooperating partners are governed by a Field Level Agreement (FLA), which refers to the SPHERE standards regarding well-being and security of personnel. The first chapter of SPHERE states the common standards which, among others, define the responsibility of actors towards the safety and protection of their staff as well as their beneficiaries. Partner organizations are accountable for the safety and security of their personnel in accordance with their ‘duty of care’ obligations as employing organizations. WFP will not provide NGOs with internal security risk management procedures, contingency planning, or arrangement mechanisms to respond to security emergencies. The WFP promotes the voluntary adoption of the Saving Lives Together (SLT) framework, which is a series of recommendations aimed at enhancing UN and NGO security collaboration in the field. SLT is a voluntary engagement. Under the SLT framework, the UN and the humanitarian community cooperate in the collection, analysis and dissemination of critical security and safety information, while operational decisions made on the basis of such information remains the responsibility of the respective organizations. Organizations that wish to cooperate under the SLT are required to maintain internal security risk management procedures, contingency planning as well as adequate and reliable arrangements to respond to security emergencies. In line with the SLT Framework, and following the SLT guidelines, WFP shall provide NGO partners involved in the implementation of the SNLRP with safe distribution guidelines to enhance partner NGOs’ ability to make informed decisions and implement necessary security arrangements to improve the safety and security of their personnel and beneficiaries. Further, in Somalia, the International NGO Safety Organization (INSO is an international charity based in The Hague and Dubai with projects in fourteen countries) supports NGOs regarding workers’ safety by providing registered NGOs with a range of free services including real-time incident tracking, analytical reports, safety related data and mapping, crisis management support, staff orientations and training, in coordination with UNDSS. The presence of dedicated INSO staff in Somalia ensures the consistent, reliable and secure sharing of security information with NGOs and facilitates implementation of other aspects of SLT, such as, engagement with UN security managers, meeting common security related needs and collaborating and consulting on the development and delivery of training.

Measures and actions to assess and manage specific risks and impacts outlined in the Shock-Responsive Safety Net for Human Capital (SNHCP)– Baxnaano Social Management Plan and Security Management Plan will be updated to apply to activities under this project.

Security Personnel: Process and procedures for possible deployment of security personnel already outlined in the Shock-Responsive Safety Net for Human Capital (SNHCP)– Baxnaano SMP and Shock-Responsive Safety Net for Human Capital (SNHCP)– Baxnaano LMP has been updated to apply to activities under this project.
In the event that security personnel are used, the contractor shall develop and implement measures and actions to assess and manage the risks to human security of project-affected communities and project workers that could arise from the use of security personnel.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement
As land acquisition, restrictions on land use or involuntary resettlement are not envisaged, this standard is not expected to be relevant

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources
Potential environmental risks and impacts associated with this ESS currently not relevant given the Project scope and activities

ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities
No groups in Somalia meet the conditions for sub-Saharan African historically underserved traditional local communities and so ESS7 is not considered relevant at this time

ESS8 Cultural Heritage
Potential Social and environmental risks and impacts associated with this ESS currently not relevant given the Project scope and activities.

ESS9 Financial Intermediaries
Potential Social and environmental risks and impacts associated with this ESS currently not relevant given the Project scope and activities.

B.3 Other Relevant Project Risks
Systemic weakness: As noted below, the Borrower’s capacity for the preventing adverse social impacts on the project is limited, as is the borrower’s capacity for redressing the impacts of social harm where it has occurred.
Mitigation: The project has two primary approaches to overcoming the low capacity of the Borrower. The first is the use of WFP as the implementing agent for the cash transfer system. WFP has a proven track record for delivering unconditional cash transfers in rural Somalia. It also noteworthy that the project will work with regional and district governments as well, where the capacity is significantly higher than in the FGS.

C. Legal Operational Policies that Apply
OP 7.50 Projects on International Waterways
No
### III. BORROWER’S ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

<table>
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<th>DELIVERABLES against MEASURES AND ACTIONs IDENTIFIED</th>
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<tr>
<td><strong>ESS 1 Assessment and Management of Environmental and Social Risks and Impacts</strong></td>
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<tr>
<td>A Project implementation unit (PIU) has been set up at MoLSA for Shock-Responsive Safety Net for Human Capital (SNHCP)– Baxnaano, including at least one Social Specialist. This PIU will apply for this project and will maintained throughout Project implementation</td>
<td>05/2020</td>
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<td>MoLSA will sign service contracts acceptable to the Association with WFP to support the implementation Component 1 activities. WFP will be required to maintained qualified social specialists with experience managing and reporting on E&amp;S risks under Shock-Responsive Safety Net for Human Capital (SNHCP)– Baxnaano for activities under this project.</td>
<td>07/2020</td>
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<td>Mobilize and, or retain from Shock-Responsive Safety Net for Human Capital (SNHCP)– Baxnaano additional staff needed on short-term or long-term assignment in accordance with SMP institutional assessment/needs, including subject matter specialists on GBV/SEA, labor conditions (health &amp; safety), Community engagement, and social inclusion.</td>
<td>05/2020</td>
</tr>
<tr>
<td>Update the Shock-Responsive Safety Net for Human Capital (SNHCP)– Baxnaano Social Management Plan (SMP) which establishes procedures to assess and manage social risks for the Project, which will include, inter alia, measures for the proper management of cash transfers, measures to prevent and respond to gender-based violence, security risks, and a clear delineation of the roles and responsibilities of MoLSA and WFP.</td>
<td>05/2020</td>
</tr>
<tr>
<td>Develop and implement procedures for managing contractors including WFP and subcontractors by: • E&amp;S requirements included in bidding documents, as applicable. • codes of conduct are required for contractors and subcontractors and their workers; • Monitor contractor commitment and compliance with ESSs • NGOs to ensure their employees are aware of the workers GRM</td>
<td>06/2020</td>
</tr>
<tr>
<td><strong>ESS 10 Stakeholder Engagement and Information Disclosure</strong></td>
<td></td>
</tr>
<tr>
<td>Prepare and disclose Shock-Responsive Safety Net for Human Capital (SNHCP)– Baxnaano SEP to apply to activities under this project. Continuously update as required</td>
<td>05/2020</td>
</tr>
<tr>
<td>ESS 2 Labor and Working Conditions</td>
<td></td>
</tr>
<tr>
<td>------------------------------------</td>
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</tr>
<tr>
<td>Update, adopt and disclose the Shock-Responsive Safety Net for Human Capital (SNHCP)– Baxnaano Labor Management Procedures (LMP) to apply to activities under this project.</td>
<td>05/2020</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>ESS 3 Resource Efficiency and Pollution Prevention and Management</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ensure that any e-waste generated by the Project is segregated from other forms of waste and is taken to licensed refurbishers, collection centers or recyclers.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>ESS 4 Community Health and Safety</th>
</tr>
</thead>
<tbody>
<tr>
<td>Measures and actions to assess and manage specific risks and impacts outlined in the Shock-Responsive Safety Net for Human Capital (SNHCP)– Baxnaano Social Management Plan and Security Management Plan updated to apply to activities under this project</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>ESS 5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Process and procedures for possible deployment of security personnel already outlined in the Shock-Responsive Safety Net for Human Capital (SNHCP)– Baxnaano SMP and Shock-Responsive Safety Net for Human Capital (SNHCP)– Baxnaano LMP will apply</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>ESS 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources</th>
</tr>
</thead>
</table>

| ESS 7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities |
B.3. Reliance on Borrower’s policy, legal and institutional framework, relevant to the Project risks and impacts

Is this project being prepared for use of Borrower Framework? No

Areas where “Use of Borrower Framework” is being considered:
Use of borrowers framework unanticipated

IV. CONTACT POINTS

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Borrower/Client/Recipient
Borrower: Federal Republic of Somalia
Implementing Agency(ies)
Implementing Agency: Ministry of Labor and Social Affairs

V. FOR MORE INFORMATION CONTACT

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VI. APPROVAL

Task Team Leader(s): Afrah Al-Ahmadi, Nadia Selim
Practice Manager (ENR/Social) Robin Mearns Cleared on 19-May-2020 at 10:08:47 EDT