

FEDERAL GOVERNMENT OF SOMALIA



MINISTRY OF EDUCATION, CULTURE AND HIGHER EDUCATION

Somalia Empowering Women through Education and Skills - Rajo Kaaba” Project (P176898)

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

March 28, 2022

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Federal Government of Somalia (“**Recipient**”), through its Ministry of Education, Culture and Higher Education (MoECHE) at Federal and Member state level will implement the **Somalia Empowering Women through Education and Skills – “Rajo Kaaba” Project (P176898)** (hereinafter known as “**the Project**”). The International Development Association (IDA, hereinafter “**the Association**”) has agreed to provide financing for the Project.
2. The Recipient will implement material measures and actions so that the Project is implemented in accordance with the Environmental and Social Standards (**ESSs**) of the World Bank. This Environmental and Social Commitment Plan (**ESCP**) sets out material measures and actions, any specific documents, or plans, as well as the timing for each of these.
3. The Recipient will also comply with the provisions of any other E&S documents required under the Environmental Social Framework (ESF) and referred to in this ESCP, including Stakeholder Engagement Plan (SEP), Environmental and Social Management Framework (ESMF), Resettlement Action Plans (RAPs), Labor Management Procedures (LMP), Security Management Plan Framework, SEAH Prevention and Response Action Plan, and Environmental and Social Management Plans (ESMPs).
4. The Recipient is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the Ministry, agency or unit 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 Recipient 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 Recipient, 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 Recipient through the minister responsible for MoECHE 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 Recipient through the MoECHE. The MoECHE will promptly disclose the updated ESCP on its publicly accessible website.
7. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, the Recipient shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts, which may include environmental, health, and safety impacts, labor influx, gender-based violence (GBV) or sexual exploitation and abuse (SEA).

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
MONITORING AND REPORTING			
A	<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 documents required under the ESCP; stakeholder engagement activities; and functioning of the grievance redress mechanism.</p>	<p>Quarterly throughout project implementation.</p> <p>Focal points for the Federal Member States will report to the Project Implementation Unit (PIU) at the Federal Government level monthly and the PIU will collate the information and submit the report to the Project Management Committee (PMC) monthly, and to the Association on quarterly basis.</p>	<p>Project Implementation Unit (PIU) at the Federal MoECHE</p>
B	<p>INCIDENTS AND ACCIDENTS NOTIFICATION</p> <p>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 details 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.</p> <p>Subsequently, as per the Association's request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.</p>	<p>The PIU will notify the Association within five days of the occurrence of the incident or accident.</p> <p>A report, including the remedial actions taken and measures put in place to mitigate future occurrences of such incidences, would be provided within a timeframe acceptable to the Association, as requested.</p> <p>Report all other incidents and accidents to the Association in quarterly reports.</p>	<p>Project Implementation Unit (PIU) at the Federal MoECHE</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
C	<p>CONTRACTORS MONTHLY REPORTS</p> <p>As per the Association’s request, provide to the Association the contractors’ and design and supervision consultants’ monthly monitoring reports on E&S implementation submitted to the PIU</p>	Upon request by the Association.	Project Implementation Unit (PIU) at the Federal MoECHE
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>Establish and maintain an organizational structure at Federal Government of Somalia (FGS) level PIU with qualified staff and resources to support the management of E&S risks including appointing within the PIU, a fulltime Environmental Specialist, a fulltime GBV/SEA specialist, a fulltime Social Specialist, a fulltime labor (health and Safety) Specialist and a fulltime Security Specialist.</p> <p>Contract a certified security risk management firm to develop a project security assessment and management plan and areas risk assessments and plans and provide support throughout the project</p>	<p>Prior to effectiveness</p> <p>3 months after effectiveness</p>	Project Implementation Unit (PIU) at the Federal MoECHE
1.2	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENT</p> <p>In accordance with the screening procedures enumerated in the Environmental and Social Management Framework (ESMF) for this project, undertake site-specific environmental and social risk screening and impact assessments for subprojects including assessment of the physical environment, location of facilities to be upgraded under the Project, availability of suitable land free of encumbrances and contestation, ensuring equity and inclusivity of site–selections - as well as capacity of likely contractors to implement ESMPs and monitoring arrangements.</p>	<p><u>The ESMF, Labour Management Procedures (LMP) and Security Management Framework (SMF) shall be prepared and cleared prior to Project effectiveness and thereafter applied throughout Project implementation</u></p> <p>Prior to implementation of site-specific subprojects.</p>	Project Implementation Unit (PIU) at the Federal MoECHE

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.3	MANAGEMENT TOOLS AND INSTRUMENTS Prepare, consult on, adopt and publicly disclose an Environmental and Social Management Framework (ESMF) for the project in a manner satisfactory to the Association	ESMF shall be prepared, <u>cleared, disclosed</u> and <u>adopted prior to Project effectiveness</u> and thereafter applied throughout Project implementation	Project Implementation Unit (PIU) at the Federal MoECHE
	Prepare, consult on, adopt and publicly disclose Labour Management Procedures (LMP) for the project in a manner satisfactory to the Association	LMP <u>shall be prepared, cleared, disclosed and adopted prior to Project effectiveness</u> and thereafter applied throughout Project implementation	Project Implementation Unit (PIU) at the Federal MoECHE
	Prepare, consult on and adopt Security Management <u>Framework (SMFP)</u> for the project in a manner satisfactory to the Association	SMP shall be prepared and cleared <u>prior to Project effectiveness</u> and thereafter applied throughout Project implementation	Project Implementation Unit (PIU) at the Federal MoECHE
	Prepare, consult on, adopt and publicly disclose, sub-project construction and operation Environmental and Social Management Plans (ESMPs) as specified in the ESMF screening criteria and in agreement with the World Bank's Environmental, Health and Safety Guidelines (EHSG), in a manner satisfactory to the Association	The Construction Phase ESMP shall be prepared and submitted to the Association for clearance before any civil works is undertaken at the Somalia Women's University. The Operation Phase ESMP shall be prepared and submitted to the Association for clearance before any intake of students at the Somalia Women's University.	Project Implementation Unit (PIU) at the Federal MoECHE
	Prepare, adopt, and disclose the Project SEAH Prevention and Response Action Plan, Resettlement	SEAH prevention <u>Prevention</u> and response <u>Response</u> Action Plan <u>to be cleared Prior prior</u> to disbursement for activities under Component 2.	Project Implementation Unit (PIU) at the Federal MoECHE

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	Update project wide Stakeholder Engagement Plan (SEP) as necessary, and publicly disclose and implement, including GM and inclusion plan satisfactory to the Association. <u>The Recipient shall ensure full implementation of the Inclusion Plan, which is an integral part of the SEP, with quarterly reporting to the Association on progress achieved.</u>	As needed throughout the project	Project Implementation Unit (PIU) at the Federal MoECHE
	Submit the Project Operations Manual, including details of all E&S requirements for the Association’s prior review and clearance.	The POM shall be approved within three months of Project effectiveness.	Project Implementation Unit (PIU) at the Federal MoECHE

<p>1.4</p>	<p>MANAGEMENT OF CONTRACTORS: Incorporate the relevant aspects of the ESCP, including the relevant E&S documents and plans, and the Labor Management Procedures and Security Management Plan, into the ESHS specifications of the procurement documents with contractors. Thereafter ensure that the contractors comply with the ESHS specifications of their respective contracts. Develop and implement procedures for managing contractors and subcontractors recruited to carry out civil works including:</p> <ul style="list-style-type: none"> • Ensure compliance with the national laws, e.g., licenses to operate and excavate any sites for project purposes; • Relevant environmental and social requirements will be included in the procurement and contracting process including bidding documents, contracts and subcontracts consistent with the requirements of ESSs; • The contractors will submit an ESMP including all E&S requirements as part of the bidding process and show that they have sufficient staff and capacity to carry it out; • Codes of conduct (CoCs) are required for contractors, subcontractors, primary suppliers and their workers covering conditions of service, OHS, GBV and security requirements; • Preparation of a detailed contractor-ESMP (C-ESMP) that is costed, with sufficient budget to mitigate E&S risks; • Monitor contractor commitment and compliance with ESSs; • Provide GM for contractor and subcontractor, primary suppliers, communities and other stakeholders as well as employees; • Ensure contractors and primary suppliers provide details on their oversight on environmental, social, health and safety (ESHS) performance and adequate mechanisms for serious incident reporting should it be required; and • Monitor the performance of the contractors and primary suppliers to ensure that they comply with the ESHS specifications of their respective contracts in accordance with the LMP, SEAH Prevention and Response Action Plan, and Security Management Plan. 	<p>Prior to the preparation of procurement documents. Supervise contractors throughout Project implementation.</p>	<p>Project Implementation Unit (PIU) at the Federal MoECHE</p>
------------	--	--	--

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES (LMP)</p> <p>Develop LMP to address labor risks, including (but not limited to)</p> <ul style="list-style-type: none"> ▪ conditions of service; ▪ code of conduct; ▪ <u>security and safety of project workers;</u> ▪ non-discrimination measures ▪ occupational, health and safety (OHS) measures; ▪ Covid-19 prevention measures; ▪ prevention of child and forced labor; ▪ emergency preparedness and response; ▪ grievance redress mechanism for project workers; ▪ training of project workers on key issues including OHS and GBV/SEAH prevention; and ▪ management of labor influx. 	<p>Not more than 3 months from effectiveness<u>The LMP shall be prepared, cleared and disclosed before Project effectiveness.</u></p>	Project Implementation Unit (PIU) at the Federal MoECHE
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Develop and maintain a Grievance Mechanism (GM) for direct project workers, including contracted and primary supply workers as part of the LMP as well as a separate confidential mechanism for GBV/SEAH complaints in order to ensure that to make sure that the complaints remain confidential and survivor-sensitive. <u>The GRM will include special channels for safe, confidential and survivor centred reporting of GBV/SEA incidents.</u></p>	<p>Grievance redress mechanism to be operational prior to engaging Project workers.</p> <p>The mechanism to be maintained throughout Project implementation.</p>	Project Implementation Unit (PIU) at the Federal MoECHE
2.3	<p>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</p> <p>Develop and implement occupational, health and safety (OHS) measures, based on World Bank EHS Guidelines, as part of the ESMF including through, inter alia, implementing adequate OHS measures and incorporating Labor Management Procedure (LMP) and Security Management Plan and SEAH Prevention and Response Action Plan requirements into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms.</p>	Measures to be operational prior to engaging Project workers.	Project Implementation Unit (PIU) at the Federal MoECHE

ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT: Resource efficiency and pollution prevention and management measures shall be covered under the ESMPs to be prepared under the clause 1.3 above.	Prepare, adopt, and publicly disclose the ESMPs prior to implementation of site-specific subprojects.	Project Implementation Unit (PIU) at the Federal MoECHE
	The Recipient shall support the development of agroforestry parklands, using indigenous vegetation on a plot ratio of 30 percent on the two campuses, which shall render ecosystem services, including climate mitigation benefits. The Project shall also include measures to incorporate climate resilience into the skills and leadership curriculum to be offered under TVET institutions as well as at the Somalia Women’s University.	Throughout Project implementation	
	As part of the ESMF, the Recipient shall develop and implement measures and procedures for managing construction waste and debris and any hazardous materials generated during construction phase of the Project and ensure their proper disposal. The contractors who will be hired to build the Somalia Women’s University shall prepare a waste management plan, which will be reviewed and approved by the PIU’s Environmental Specialist.	Monitor implementation of the ESMPs throughout Project implementation.	
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	COMMUNITY HEALTH AND SAFETY: Adopt and implement measures and actions to assess and manage specific risks and impacts to the community arising from Project activities, including risks of labor influx; risk of exposure to infectious diseases (including COVID-19 and HIV/AIDS); response to emergency situations due to conflict or natural disasters, construction and structural safety risks, as well as traffic and road safety risks, and include these measures and actions in the ESMPs to be prepared in accordance with the ESMF , in a manner acceptable to the Association. Ensure that the new facilities to be upgraded under this Project are designed and modelled on the internationally accepted safe standards for institutions, with provision of adequate access to potable water and sanitation for women, youth and other enrolled persons and their teachers. The Recipient shall also ensure that indoor air quality (IAQ) is in compliance with World Health Organisation guidelines, including working to eliminate smoking in public spaces in the project-supported facilities.	Prepare, adopt, and publicly disclose the ESMPs prior to implementation of site-specific subprojects. Monitor implementation throughout Project implementation.	Project Implementation Unit (PIU) at the Federal MoECHE

<p>4.2</p>	<p>GBV AND SEAH RISKS: Prepare, adopt, publicly disclose and implement a stand-alone project wide SEAH Prevention and Response Action Plan to assess and manage the risks of sexual exploitation and abuse, sexual harassment as well as other forms of GBV.</p> <p>Key measures include:</p> <ul style="list-style-type: none"> • CoCs for project and contracted workers; and plan for sensitization/awareness raising for the community and intended training activities for workers on CoC and GBV/SEAH provisions; • Mapping and development of partnerships with identified GBV service providers; • A Reporting and Response Framework that outlines key requirements for reporting cases if they arise and measures to enable safe, ethical, survivor-centered response; • An Accountability Framework that outlines how the PIU/contractor will handle allegations, including related to investigation (in alignment with national processes) and sanctions for potential perpetrators; and • Establishment of special channel/procedures for safe, confidential and survivor centered reporting of GBV incidence that connect to the project GM and enable training of GM operators on how to respond to cases that come forward. • Development of additional protection measures to address potential sexual harassment in recruitment practices and in the workplace. • Clarification of GBV/SEAH requirements in bidding documents including requirements for CoCs, training of workers, and how GBV related costs will be covered in the contract. • Bid evaluations to include consideration for GBV/SEAH response proposals. • Identification of a Third-Party Monitoring to track implementation and management of GBV/SEAH risks; • Ensuring additional funds are made available to implement measures to address 	<p>Prior to disbursement for activities under Component 2.</p> <p>Implement the SEAH prevention and response Action Plan throughout Project implementation.</p>	<p>Project Implementation Unit (PIU) at the Federal MoECHE</p>
------------	---	---	--

	GBV/SEAH risks and impacts that may arise during Project implementation.		
4.3	<p>SECURITY PERSONNEL:</p> <p>Prepare, adopt, and implement a Project-wide Security Management <u>Framework</u> consistent with the requirements of ESS4, in a manner acceptable to the Bank.</p> <p>Prepare, adopt, and implement a Project-wide Security Risk Assessment and Management Plan consistent with the requirements of ESS4, in a manner acceptable to the Bank. <u>The project-wide Security Risk Assessment and Management Plan will be prepared by a certified security risk management firm, which will also prepare area-specific risk assessments and plans.</u></p>	<p>Prior to <u>Project</u> effectiveness</p> <p>Prepare and adopt and clear <u>area-specific</u> Security Management Plan prior to disbursement for activities under components <u>2&3</u>.</p>	Project Implementation Unit (PIU) at the Federal MoECHE

ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	<p>LAND ACQUISITION AND RESETTLEMENT ACTION PLANS:</p> <p>Prepare, adopt, and publicly disclose, Resettlement <u>Action Plan (RAPs)</u> and land agreements in accordance with ESS5 and consistent with the requirements of the <u>RAPs</u>; and</p> <p>Thereafter, implement the respective <u>RAPs</u> in a manner acceptable to the Association.</p>	<p>To be cleared and disclosed by the Association prior to disbursement for activities under Component 2.</p> <p>Prior to construction activities.</p>	Project Implementation Unit (PIU) at the Federal MoECHE

5.2	<p>FORCED DISPLACEMENT PRIOR TO PROJECT APPROVAL: Should involuntary resettlement displacement occur in anticipation of construction or in any other project-financed infrastructure before board approval of the Project, relevant ESS5 requirements will be applied retroactively.</p> <p>If such requirements cannot be satisfied retroactively, the Bank will not support such colleges, or any other infrastructure development carried out.</p>	<p>Identification of such prior forced displacement when conducting screening and census survey during the RP process of subprojects.</p>	<p>Project Implementation Unit (PIU) at the Federal MoECHE</p>
<p>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</p>			
6.1	<p>BIODIVERSITY RISKS AND IMPACT: Consistent with the ESMF, ensure that ESS6-related measures are included in the ESMPs for subprojects, and that such measures are adopted and implemented in a manner acceptable to the Association.</p>	<p>Prepare, adopt, and publicly disclose the ESMPs prior to implementation of site-specific subprojects.</p> <p>Carry out the ESMP throughout Project implementation.</p>	<p>Project Implementation Unit (PIU) at the Federal MoECHE</p>
<p>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</p>			
	<p>This standard is not relevant, as there are no persons that meet the identification criteria for IP/SSAHUTLCs <u>yet</u>.</p>		
<p>ESS 8: CULTURAL HERITAGE</p>			
8.1	<p>CULTURAL HERITAGE AND CHANCE FINDS: Consistent with the ESMF ensure that ESS8 related measures are included in the Environmental and Social Management Plans (ESMPs) for subprojects and that such measures are adopted and implemented in a manner acceptable to the Association.</p> <p>Prepare, adopt, and implement - if applicable - the chance finds procedure described in the ESMPs developed for sub-projects.</p>	<p>Prepare, adopt, and publicly disclose the ESMPs prior to implementation of site-specific subprojects</p> <p>Carry out the ESMPs, including complying with chance finds procedures, throughout Project implementation.</p>	<p>Project Implementation Unit (PIU) at the Federal MoECHE</p>

ESS 9: FINANCIAL INTERMEDIARIES			
	Not relevant to the project		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN (SEP) PREPARATION AND IMPLEMENTATION: Update, disclose and implement a SEP, in a manner acceptable to the Association.</p>	<p>SEP has been prepared. To be updated regularly throughout Project implementation.</p>	<p>Project Implementation Unit (PIU) at the Federal MoECHE</p>
10.2	<p>PROJECT GRIEVANCE MECHANISM: Ensure a functioning, trusted and accessible Project GM, in line with the SEP. Accessible grievance arrangements shall be made publicly available to receive and facilitate resolution of concerns and grievances in relation to the Project, consistent with ESS10, in a manner acceptable to the Association. The GRM will include special channels for safe, confidential and survivor centered reporting of GBV/SEA.</p>	<p>Prior to disbursement for activities under Components 2.</p>	<p>Project Implementation Unit (PIU) at the Federal MoECHE</p>
CAPACITY SUPPORT (TRAINING)			

	<p>MATERIAL MEASURES</p> <p>The Recipient shall implement capacity enhancement for the PIU on:</p> <ul style="list-style-type: none">■ stakeholder mapping and engagement■ relevant aspects of environmental and social assessment, including scoping and screening procedures■ emergency preparedness and response planning■ environmental health and safety guidelines■ gender-based violence■ occupational health and safety■ establishment and monitoring of the grievance redress mechanism■ incorporating environmental and social risk mitigation management measures into procurement (pre- and post-bidding) and contract management		
--	---	--	--