

FEDERAL REPUBLIC OF SOMALIA



FEDERAL GOVERNMENT OF SOMALIA

MINISTRY OF HEALTH

IMPROVING HEALTHCARE SERVICES IN SOMALIA PROJECT
("DAMALCAAFIMAAD") (P178876)
FOURTH ADDITIONAL FINANCING

ENVIRONMENTAL AND SOCIAL
COMMITMENT PLAN (ESCP)

Negotiated Version

5th May 2026

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Federal Republic of Somalia (**the Recipient**) will implement the Improving Healthcare Services in Somalia Project (**the Project**, or the Damal Caafimaad Project), with the involvement of the Ministry of Health (MoH) as set out in the Original Financing Agreement, GFF Grant Agreement, GCF Grant Agreement, GFF Grant Agreement Additional Financing, and the Fourth Additional Financing Agreement (collectively, “Agreements”). The International Development Association (**the Association**), has agreed to provide financing for the Project, as set out in the referred Agreements. This ESCP supersedes previous versions of the ESCP for the Project and shall apply both to the original and the additional financings for the Project referred to above.
2. The **Recipient** shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to **the Association**. The ESCP is a part of the Agreements. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreement.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that **the Recipient** shall carry out or cause to be carried out, including, as applicable, their respective timeframes; institutional, staffing, training, monitoring and reporting arrangements; and grievance management. The ESCP also sets out the environmental and social (E&S) documents that shall be prepared or updated, consulted, disclosed and implemented under the Project, consistent with the ESSs, in form and substance acceptable to **the Association**. Said E&S documents may be revised from time to time with prior written agreement by **the Association**. As provided for under the referred Agreements, **the Recipient** shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.
4. As agreed by **the Association** and **the Recipient**, this ESCP will be revised from time to time, if necessary, to reflect adaptive management of Project changes or unforeseen circumstances or in response to Project performance. In such circumstances, **the Association** and **the Recipient** agree to update the ESCP to reflect these changes through an exchange of letters signed between **the Association** and Director General, Ministry of Health. **The Recipient** shall promptly disclose the updated ESCP.
5. The subsection on “Indicators for Implementation Readiness” below identifies the actions and measures to be monitored to assess Project readiness to begin implementation in accordance with this ESCP. Nevertheless, all actions and measures in this ESCP shall be implemented as set out in the “Timeframe” column below irrespective of whether they are listed in the referred subsection.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUP			
A	<p>ORGANIZATIONAL STRUCTURE</p> <p>(a) Maintain a Project Coordination and Implementation Unit (PCIU) of the Ministry of Health at the Federal Government of Somalia level with qualified staff and resources to support management of ESHS risks and impacts of the Project including one full-time qualified Environmental specialist, one Senior Social specialist and one qualified GBV specialist</p> <p>(b) Maintain a Project Management Teams (PMTs) at the Federal Member States (FMS) level and Somaliland with one qualified full-time social specialist, one GBV specialist and one environmental specialist and resources to support management of ESHS risks and impacts of the Project.</p> <p>(c) FMOH through the PCIU shall require and ensure that implementing partners have adequate Environmental, social and GBV expertise to manage the E&S risks throughout the Project. The Recipient shall require the implementing partners to perform their functions for the Project in accordance with the ESF.</p> <p>(d) Continue to implement the E&S capacity assessment and capacity building plan according to the agreed schedule and that there is sufficient capacity at all levels for E&S implementation. Implementing partners shall develop and share a capacity enhancement plan for training health workers under the project.</p> <p>(e) Hold regular coordination meeting quarterly between the PCIU, PMTs, and implementing partners to ensure consistent application of ESHS standards and adaptive management of project risks, including GBV/SEA/SH and environmental issues.</p> <p>(f) Ensure the full implementation of the SEA-SH Accountability and Response Framework developed by the PCIU throughout the project cycle, including strict adherence to SEA-SH reporting protocols, survivor-centered procedures, and timely execution of investigation processes in compliance with World Bank requirements.</p>	<p>(a) Maintain PCIU positions that include one full-time qualified Environmental specialist, one Senior Social specialist and one qualified GBV specialist hired for PCIU throughout Project implementation.</p> <p>(b) Maintain PMTs at each FMS with qualified full time social, GBV and environmental specialists throughout the implementation period.</p> <p>(c) The implementing partners/contractors shall maintain adequate Environmental, social and GBV expertise to manage the E&S risks in line with the ESF requirements throughout the Project period.</p> <p>(d) Continue to implement the E&S capacity assessment and capacity building plan throughout Project implementation.</p> <p>(e) Establish and conduct quarterly coordination to be held every three months throughout the project implementation period.</p> <p>(f) Throughout project implementation the progress to be reported quarterly.</p>	PCIU/FMS PMTs

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>B CAPACITY BUILDING PLAN/MEASURES</p> <p>Implement the ESF Capacity Enhancement Action Plan that was updated in July 2023, based on the E&S capacity needs assessment within the Ministry of Health. The Action Plan shall be implemented within the timeline for capacity building as enumerated in the ESMF for both the client and the implementing partners. Training topics to be provided shall include the following:</p> <ul style="list-style-type: none"> • The World Bank’s ESF in general; • Stakeholder mapping and engagement; • Occupational Health and Safety (OHS) and Community Health and Safety issues (such as OHS measures in rehabilitation, construction and maintenance of health facilities); • Prioritize training of the contractors and their workers on structural safety issues; • Infection Control and Waste Management; • Laboratory biosafety guidance and use of PPE • Practical training on installing, operating, and decommissioning of solar power equipment and SDD refrigerators, as well as safe disposal of obsolete power generating and cooling parts; • Preparation of E&S instruments, including ESMP, SEP and LMP; • Screening and monitoring of Project activities; • Management of Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) Gender Based Violence (GBV) including GBV Concepts and Guiding Principles, Clinical Management of Rape CMR, Psychosocial Support, GBV Case management, PSEA and Sexual Harassment in the workplace and • GM establishment and management. <p>Targeted groups will include the following:</p> <ul style="list-style-type: none"> • PCIU in the Ministry of Health • Federal level PMT • Contractors/subcontractors and their Project workers • Community-based committees responsible for management and operation of health centers • Third party monitors and supervision agents. • Affected communities • Key stakeholders 	<ul style="list-style-type: none"> • Implement the ESF Capacity Enhancement Action Plan throughout project implementation. • Training will be carried out throughout the Project as required by contracted E&S specialists, and as per the timelines specified in the ESMF and in accordance with the action plan agreed as part of the needs assessment report • A pre-bidding conference on E&S requirements will be carried out before bidding. • Training in E&S requirements and new tools for all PCIU and PMT staff and contractors will be carried out by the client before implementation. 	<p>PCIU, PMT and IPs</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
MONITORING AND REPORTING			
C	<p>REGULAR REPORTING</p> <p>(a) Prepare and submit to the [Bank/Association] regular monitoring reports on the environmental, social, health and safety (E&S) performance of the Project. The reports shall include:</p> <ul style="list-style-type: none"> • Status of preparation and implementation of E&S documents required under the ESCP. • Summary of stakeholder engagement activities carried out as per the Stakeholder Engagement Plan. • Complaints submitted to the grievance mechanism(s), the grievance log, and progress made in resolving them. • E&S performance of contractors and subcontractors as reported through monthly contractors' and supervision firms' reports. • Number and status of resolution of incidents and accidents reported under action E below. • GBV/SEA/SH Progress Report and Implementation of GBV/SEA-SH Action Plan 	<p>(a) Continue to submit quarterly reports to the Association throughout Project implementation. Submit each report to the Association no later than fifteen (15) working days after the end of each reporting period. The PMT at FMS level shall report progress to the Federal Government of Somalia level PCIU on a monthly basis. The implementing partners shall be required to report to the PMT and PCIU on ESMP implementation every month.</p>	PCIU/PMTs
D	<p>CONTRACTORS' QUARTERLY REPORTS</p> <p>(a) Require contractors and supervising firms to provide quarterly monitoring reports on E&S performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the Association.</p> <p>(b) Notify the Association of any referral submitted to the Dispute Avoidance and Adjudication Board (DAAB) to initiate a process of compliance review in relation to a contractor's obligations to prevent and respond to GBV, SEA, and/or SH, as specified in the respective works contract with such contractor; and, in the event of any such referral, notify the Association of: (i) the DAAB's decision on such referral; (ii) the contractor's Notice of Dissatisfaction, if any, with such DAAB decision; (iii) any notification received on the commencement of an emergency arbitration proceeding or full arbitration proceeding in relation to the DAAB's decision; and (iv) the resulting emergency arbitration order and/or full arbitration order, if any.</p>	<p>(a) Submit the quarterly ESHS Performance Reports to the Association as annexes to be submitted under action (C) above</p> <p>(b) No later than 10 days after the issuance or receipt, as applicable, of the relevant document (i.e., referral to the DAAB, issuance of DAAB decision, Notice of Dissatisfaction, notice of commencement of emergency/full arbitration, emergency/full arbitration order, as applicable).</p>	PCIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
E	<p>INCIDENTS AND ACCIDENTS</p> <p>Promptly notify the Bank/Association of any incident or accident relating to the project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including those resulting in death or significant injury to workers or the public; acts of violence, discrimination or protest; unforeseen impacts to cultural heritage or biodiversity resources; pollution of the environment; dam failure; forced or child labor; displacement without due process (forced eviction); allegations of sexual exploitation or abuse (SEA), or sexual harassment (SH); or disease outbreaks. Provide available details of the incident or accident to the Association upon request, using the project incident forms/template.</p> <p>Arrange for an appropriate review of the incident or accident to establish its immediate, underlying and root causes. Prepare, agree with the [Bank/Association], and implement a Corrective Action Plan that sets out the measures and actions to be taken to address the incident or accident and prevent its recurrence.</p>	<p>a) Notify the Association no later than 24 hours after learning of the incident or accident. SEA/SH cases notifications must be made within 24 hours. Provide available details upon request.</p> <p>b) Provide review report and Corrective Action Plan to the Association no later than 10 days following the submission of the initial notice, unless a different timeframe is agreed to in writing by the Association.</p>	PCIU/PMTs
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS</p> <p>(a) Maintain and implement the ESMF for the Project which includes GBV Action Plan, the Infection Control and Waste Management Plan (ICWMP) and Inclusion Plan as annexes, consistent with the relevant ESSs.</p> <p>(b) Maintain and implement the Contractor’s sub-project Environmental and Social Management Plan (ESMP), which include relevant actions to give effect to the ESF needs assessment and capacity building plan in the ESMF, in accordance with the ESSs and E&S requirements of the Project.</p> <p>(c) Maintain and implement the ESMPs prepared under the COVID-19 Emergency Vaccination Project (P176956) and updated to reflect the name Improving Healthcare Services in Somalia Project (Damal Caafimaad) and include measures to adequately address Life & Fire Safety in accordance with the WBG EHS guidelines and Emergency Preparedness and Response.</p> <p>(d) Conduct a due diligence process for all IPs and contractors in respect of E&S requirements per WBG’s Environment, Health and Safety Guidelines (EHSGs), including security management, labour management (incl. OHS), GBV prevention and response, SEA/SH Risks Mitigation, Stakeholder Engagement and grievance redress and environmental and social risk management.</p>	<p>(a) Maintain and implement the ESMF which includes GBV Action Plan, ICWMP and Inclusion Plan that was prepared, consulted upon, disclosed and adopted under GFF Grant Agreement Additional Financing throughout the project.</p> <p>(b) Before commencement of any sub-projects, Recipient shall obtain the Association’s prior approval of the sub-project ESMPs and shall publicly disclose the ESMPs.</p> <p>(c) Implement the updated ESMPs throughout project implementation</p>	PCIU/FMS Project Coordination Unit/SPCUs

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>(e) Implement the cleared area- or contractor-specific environmental and social management plans (ESMPs) and area-specific ICWMPs developed in accordance with the ESSs, including the ESMF, the GBV Action Plan, ICWMP, Labor Management Procedures (LMP), Security Management Framework and Stakeholder Engagement Plan, the Environmental Health and Safety Guidelines (EHSGs), and other relevant Good International Industry Practice (GIIP) including the relevant WHO guidance on health centers operation, in a manner acceptable to the Association. The contractor ESMPs incorporates the relevant aspects of this ESCP, including, inter alia, any environmental and social assessment and management plans or other instruments, ESS2 requirements, and any other required ESHS measures, into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply with the E&S specifications of their respective contracts.</p>	<p>(d) Before commencement of any sub-projects, and thereafter throughout the carrying out of such activities.</p> <p>(e) Implement the sub-project ESMPs and ICWMPs throughout Project implementation.</p>	
1.2	<p>MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&S instruments, SEA/SH, the Labor Management Procedures (incl. OHS), SEP, and code of conduct, into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter, ensure that the contractors and supervising firms comply and cause subcontractors to comply with the ESHS specifications of their respective contracts. The Recipient shall ensure that all contractors and implementing partners faithfully implement and report on all relevant ESS guidelines and management plans as outlined in this ESCP. In particular, the Recipient shall ensure that contractors will update their security Activity plans and travel security procedures, security training and incorporating incident reporting systems in the health facilities' plan of work and budget. Contractors shall be held responsible for putting in place reporting procedures, including reporting procedures for significant security incidents.</p>	<p>As part of the preparation of procurement documents and respective contracts.</p> <p>Supervise contractors throughout Project implementation. Copies of relevant contracts provided to the Association upon request.</p>	PCIU/PMTs
1.3	<p>TECHNICAL ASSISTANCE</p> <p>Continue to carry out the consultancies, studies (including feasibility studies, if applicable), capacity building, training, and any other technical assistance activities under the Project in accordance with terms of reference acceptable to the Association, that are consistent with the ESSs. Thereafter prepare and finalize the outputs of such activities in compliance with the terms of reference.</p>	Throughout Project implementation.	PCIU
1.4	<p>CONTINGENT EMERGENC RESPONSE FINANCING</p> <p>(a) In the event that the CERC is activated, ensure that the Emergency Response Operations Manual includes a description of the ESHS assessment and management arrangements including ensuring, if applicable, CERC-ESMF/ESMF Addendum is included or referred to in the Emergency Response Operations Manual for the implementation of CERC, in accordance with the ESSs.</p>	(a) The adoption of the Emergency Response Operations Manual in form and substance acceptable to the Bank is a disbursement condition under Section III.B.1.d of Schedule 2 of the Original	PCIU

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY	
<p>(b) Prepare, consult upon, adopt, and publicly disclose any environmental and social (E&S) management plans or instruments which may be required for activities under CERC of the Project, in accordance with the Emergency Response Operations Manual - and, if applicable, CERC-ESMF or CERC-ESMF Addendum - and the ESSs, and thereafter implement the measures and actions required under said E&S management plans or instruments, within the timeframes specified in said E&S management plans or instruments.</p>	<p>Financing Agreement for the Project.</p> <p>(b) The E&S management plans or instruments shall be prepared, consulted upon, and thereafter adopted and publicly disclosed, before the carrying out of the relevant Project activities under CERC. The E&S management plans or instruments shall be implemented in accordance with their terms, throughout Project implementation.</p>		
<p>1.5</p>	<p>EXCLUSIONS</p> <p>Exclude the following types of activities/sub-projects as ineligible for financing under the project:</p> <ul style="list-style-type: none"> • Activities/sub-projects classified as High Risk under the World Bank Environmental and Social Framework • Activities that have a high probability of causing serious adverse effects to human health and/or the environment. • Activities that may adversely affect lands or rights of Traditional Local Communities or other vulnerable and marginalized groups. • Associated facilities which do not meet the requirements of the ESSs, whether the beneficiaries have, or do not have control or influence over such associated facilities. • Activities that may have significant adverse social impacts and/ or may give rise to significant social or community conflict. • Sub-project/ activity with either adverse impacts on land or natural resources under traditional/customary use or have risks associated with the relocation of Vulnerable and Marginalized Groups (VMGs) coupled with any negative impact on their cultural sites/heritage • Activities that may involve involuntary resettlement or land acquisition (physical relocation of PAPs). • Activities that may involve economic displacement of more than 200 PAPs • Any other excluded activities as set out in the ESMF for the Project. 	<p>Throughout Project implementation.</p>	<p>PCIU/PMTs</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.6	<p>IMPLEMENTATION OF PROJECT ACTIVITIES IN SOMALILAND</p> <p>Before financing project activities in Somaliland, the Recipient shall ensure that (a) the Somaliland Manual has been adopted which: (i) includes institutional arrangements and responsibilities for managing E&S risks, description of the ESHS assessment and management arrangements; (ii) includes or refers E&S instruments and plans referred to in paragraph 1.2 above; and (b) institutional arrangements, satisfactory to the Association as shall be required to carrying out the Project in Somaliland - including managing the Project's E&S risks are in place; all in accordance with the ESSs.</p>	Before disbursement of funds for implementing Project activities in Somaliland.	PIU of the Somaliland Ministry of Health Development
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>(a) Implement the Project Labor Management Procedures (LMP).</p> <p>(b) Consistent with the Project's LMP and ESS2, the implementing partners shall implement sub-project Labor Management Plans for subprojects developed as part of ESMPs to address labor risks, including but not limited to:</p> <ul style="list-style-type: none"> • occupational, health and safety (OHS) measures, following WBG EHSGs. • prevention of child and forced labor. • emergency preparedness and response. • grievance redress mechanism (GRM) for Project workers. • training of Project workers on key issues including OHS and GBV prevention and response based on survivor central approach, and management of labour influx. <p>(c) The Project shall be carried out in accordance with the applicable requirements of ESS2, in a manner acceptable to the Association, including through, inter alia, implementing adequate occupational health and safety measures (including emergency preparedness and response measures), setting out grievance arrangements for Project workers, and incorporating labour requirements into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms.</p>	<p>(a) Throughout Project implementation</p> <p>(b) Ensure implementation of the LMPs by MoH, contractors, supervising agents and primary suppliers throughout Project life cycle. Any updates on LMP shall be done before commencing work of subprojects.</p> <p>(c) Throughout project implementation</p>	PCIU/PMTs
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Maintain and operate a grievance mechanism for Project workers, as described in the LMP, and ESMF, and consistent with ESS2. Ensure that contractors do the same for their subproject, as described in the project's LMP and sub-project Labour Management Plans and consistent with ESS2. The said Grievance Mechanism shall also apply to workers under AF 4 interventions and activities.</p>	Throughout Project implementation.	PCIU/PMTs

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>WASTE MANAGEMENT PLAN</p> <p>a) Implement the Project-wide Infection Control and Waste Management Plan, as part of the ESMF prepared for the Project, to manage hazardous and non-hazardous wastes, consistent with ESS3, and Somalia National HCWM guidelines.</p> <p>b) Implement sub-project/ regional ICWMPs, which contain measures to manage and dispose health care waste, including wastes of the proposed incinerators and wastes of expected activities and interventions under AF1,AF3, and AF4 as well as other types of hazardous and non-hazardous waste in accordance with ESS3 and in a manner acceptable to the Association.</p>	<p>a) Implement Project-wide Infection Control and Waste Management Plan, same timelines as the ESMF under 1.1 and implement throughout Project implementation.</p> <p>b) Sub project-specific/regional ICWMPs shall be implemented throughout Project implementation.</p>	PCIU/PMTs
3.2	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p> <p>a) Ensure that contractors and supervising firms develop, consult upon, adopt, publicly disclose, and implement Contractor’s ESMPs including resource efficiency and pollution prevention and management measures consistent with the Project’s ESMF and ESS3 for subprojects, in a manner acceptable to the Association.</p> <p>b) Implement the C-ESMPs updated by the Contractors under AF 3 to reflect the change of name from COVID-19 Emergency Vaccination Project to Improving Healthcare Services in Somalia Project (Damal Caafimaad)</p>	<p>a) Obtain prior review and approval of the ESMPs by the Association and publicly disclose ESMPs before commencement of sub-projects. Carry out and oversee the implementation of the ESMPs throughout Project implementation.</p> <p>b) Implement the updated C-ESMPs of the sub-projects throughout project implementation.</p>	PCIU/PMTs
ESS 4 COMMUNITY HEALTH AND SAFETY			
4.1	<p>TRAFFIC AND ROAD SAFETY</p> <p>a) Incorporate measures to manage traffic and road safety risks as required in the ESMP to be prepared consulted upon, adopted, publicly disclosed under action 1.1 above.</p> <p>b) Require contractors and subcontractors to incorporate measures to manage traffic and road safety risks in their C-ESMPs.</p> <p>c) Require contractors to incorporate Emergency Preparedness and Response measures and Life and Safety Management provisions, in alignment with the WB, EHS Guidelines.</p>	Same timeframe as for the preparation and implementation of the ESMP.	PCIU/PMTs
4.2	COMMUNITY HEALTH AND SAFETY	a) Same timeframe as for the preparation and implementation of ESMPs.	PCIU/PMTs

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>a) Assess and manage specific risks and impacts to the community arising from project activities, including, inter alia, community health and safety risks, construction and structural safety, traffic and road safety, exposure to health issues, emergency situations, deployment of security personnel, labor influx, and include mitigation measures in the ESMPs to be prepared in accordance with the ESMF.</p> <p>b) Ensure that the six hospitals incorporate the principles of Universal Access.</p> <p>c) Prior to occupation or use of the hospitals, a qualified independent Life & Fire Safety (LFS) specialist will sign off that the 6 hospitals meet the WBG LFS requirements.</p>	<p>b) During design and construction of the six hospitals</p> <p>c) Prior to occupation of the 6 hospitals.</p>	
4.3	<p>SEA AND SH RISKS</p> <p>a) Implement the GBV/SEA-SH Action prepared as part of the ESMF, to assess and manage the risks of sexual exploitation and abuse (SEA/ and sexual harassment (SH).</p> <p>b) Ensure that contractors and supervising agents develop and implement a contractor’s GBV Action Plan as part of the Contractor’s ESMP, based on the Project GBV Action Plan and E&S instruments that have been developed for the project. The GBV Action Plan submitted by the contractors shall have a capacity plan acceptable to the Association.</p>	<p>a) Implement the GBV Action Plan as part of the ESMF within the timeframes defined in 1.1 and thereafter maintain the GBV/SEA-SH Action Plan throughout Project implementation.</p> <p>b) The Contractor GBV Action Plan shall be prepared and cleared before awarding the contract and will be implemented throughout project implementation.</p>	PCIU/PMTs/
4.4	<p>SECURITY MANAGEMENT</p> <p>a) Where applicable, enter into a memorandum of understanding (MoU), with the relevant authority at national, state and district level in charge of security setting out the arrangements for the engagement of the security personnel in the Project, including the relevant actions and measures set out in this ESCP, and continued compliance with ESS4 and the World Bank’s Good Practice Note on the Use of Security Forces.</p> <p>b) Adopt and implement standards, protocols, and codes of conduct for the selection and assignment of security personnel to the Project, and screen security personnel to verify that they have not engaged in past unlawful or abusive behavior, including sexual exploitation and abuse (SEA), sexual harassment (SH) or excessive use of force.</p>	Prior to engagement of Security Personnel	PCIU/PMTs
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	RESETTLEMENT [FRAMEWORK] [PLAN] or [PLANS]		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	This standard is not relevant to this Project		
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	BIODIVERSITY RISKS AND IMPACTS Relevant aspects of this standard shall be considered, as needed, in the ESMF prepared under Section 1.1. The Recipient shall screen sub-projects, prepare, consult upon, adopt, publicly disclose ESMPs with relevant measures for management of risks and impacts on biodiversity, consistent with ESS6. The Recipient shall screen and exclude sub-projects and activities that are likely to have impacts on biodiversity, critical habitats and protected areas.	Same timeframe as for the preparation and implementation of ESMPs.	PCIU/PMTs
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	INDIGENOUS PEOPLES [FRAMEWORK] [PLAN] or [PLANS] This standard is not relevant to this Project		
ESS 8: CULTURAL HERITAGE			
8.1	CULTURAL HERITAGE RISKS AND IMPACTS Consistent with the ESMF ensure that ESS8 related measures are included in the ESMPs for subprojects and that such measures are adopted and implemented in a manner acceptable to the Association.	<ul style="list-style-type: none"> Obtain prior review and approval of the ESIAs/ESMPs by the Association and disclose them before the contractor bidding phase of the respective subproject. Implement the ESMPs throughout subproject implementation. 	PCIU/PMTs
8.2	CHANCE FINDS Describe and implement Chance Finds Procedure consistent with ESS8 as part of the ESMF and in each Contractor's ESMPs.	Maintain the chance find procedures in the ESMF under the same timelines as 1.1 and in the site specific ESMPs and thereafter Implement the procedures throughout Project implementation.	PCIU/PMTs
ESS 9: FINANCIAL INTERMEDIARIES			
9.1	This standard is not relevant to this Project		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN		PCIU/PMTs

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>Update and implement a Stakeholder Engagement Plan (SEP) for the Original Project and revised under AF1, 2 and 3, consistent with ESS10, which shall include measures to, inter alia, provide stakeholders with timely, relevant, understandable, and accessible information, disseminated in local languages (primarily Somali) and through diverse accessible formats, including community radio, public meetings, mobile messaging (SMS), and visual aids, recognizing varied literacy levels and communication preferences, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.</p> <p>The SEP comprise an Inclusion Plan and provide for engagement with vulnerable and marginalized persons and traditional healers.</p>	The updated SEP was redisclosed on 29 April 2026. To be implemented throughout Project implementation period.	
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>a) Publicize, maintain, and operate an accessible grievance mechanism, to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10.</p> <p>b) The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.</p>	Project Grievance Mechanism established and enhanced under the AF2, will be maintained throughout Project implementation	PCIU/PMTs
<p>INDICATORS FOR IMPLEMENTATION READINESS</p> <p>The following actions are indicators for implementation readiness:</p> <ul style="list-style-type: none"> i. Maintain the project PCIU and PMTs with qualified environmental, social and GBV Specialists. ii. Update and redisclose the SEP. iii. Ensure the Project grievance mechanism is operational and accessible, including for SEA/SH referrals. iv. Ensure implementing partners and contractors maintain adequate E&S staffing and capacity arrangements prior to commencement of AF4-supported activities. 			