

GOVERNMENT OF SOMALILAND

De-Risking, Inclusion, and Value Enhancement of Pastoral Economies in the Horn of Africa (P176517)

ENVIRONMENTAL and SOCIAL COMMITMENT PLAN (ESCP)

19 February 2026

1. The Government of Somaliland (“Recipient”), is implementing the **De-Risking, Inclusion, and Value Enhancement of Pastoral Economies in the Horn of Africa (DRIVE) Project** (hereinafter known as “**the Project**”), with the involvement of the **Somaliland Quality Control Commission (SQCC)** as the Implementing Agency as set out in the Financing Agreement (the Agreements). The International Development Association (the **Association**) has agreed to provide financing for the Project.
2. The Recipient shall implement material measures and actions so that the project is implemented in accordance with the Environmental and Social Standards (**ESSs**) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Bank. The ESCP is a part of the Agreement[s]. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the Agreement(s).
3. The Recipient shall also comply with the provisions of any other Environmental and Social (E&S) documents required under the Environmental and Social Framework (ESF) and referred to in this ESCP, such as Environmental and Social Management Framework (ESMF), Environmental and Social Management Plans (ESMPs), Labor Management Procedures (LMP), Security Management Plan (SMP), Sexual Exploitation and Harassment (GBV/SEAH) Prevention and Response Plan, and Stakeholder Engagement Plan (SEP) and the timelines specified in those E&S documents.
4. 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 the assessment of Project performance conducted under the ESCP itself. In such circumstances, the Recipient through the minister responsible for MoF shall agree to the changes with the Association and shall update the ESCP to reflect such changes. Agreement on changes to the ESCP shall be documented through the exchange of letters signed between the Association and the Recipient through the minister responsible for MoF. The MoF shall promptly disclose the updated ESCP on its publicly accessible website.
5. The Recipient is responsible for compliance with all requirements of the ESCP even when the implementation of specific measures and actions is conducted by the Ministry, agency, or unit referenced in 1, above.
6. Implementation of the material measures and actions set out in this ESCP shall 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 shall monitor and assess the progress and completion of the material measures and actions throughout the implementation of the Project.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT			
A	<p>ORGANIZATIONAL STRUCTURE</p> <p>Overall coordination of the project shall be by the Ministry of Finance and Somaliland Quality Control Commission (SOQCC) and other relevant agencies and departments.</p> <p>i. Establish and maintain an organizational structure including one officer full-time to fulfill the duties regarding environment and social risk management. The SERP PIU will transition to Somaliland DRIVE PIU.</p>	<p>i. Before the start of activities on component 2 and throughout project implementation.</p>	<p>i. PIU</p>
B	<p>CAPACITY BUILDING PLAN/MEASURES</p> <p>Prepare and implement the projects capacity building plan including training of PIU staff, stakeholders, communities, Project workers on occupational health and safety, community health and safety, disability Inclusion, grievance redress mechanism and GBV/SEA/SH prevention and mitigation.</p>	<p>Throughout project implementation</p>	<p>i. PIU</p>
MONITORING AND REPORTING			
C	<p>REGULAR REPORTING</p> <p>Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (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. 	<p>i. Quarterly and annually throughout the project implementation period commencing after the Effective Date of the Financing Agreement.</p> <p>i. Submit each report to the Association no later than 14 days after the end of each reporting period.</p>	<p>i. PIU</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<ul style="list-style-type: none"> Number and status of resolution of incidents and accidents reported under action E below. 		
D	<p>CONTRACTORS' MONTHLY REPORTS</p> <p>a) Require contractors and supervising firms to provide monthly 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:</p> <ul style="list-style-type: none"> 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>a) Submit the monthly ESHS Performance Reports to the Association as annexes to be submitted under action (C) above</p> <p>b) Submit the Synthesized ESHS Performance Reports to the PIU on quarterly basis.</p> <p>c) No later than 7 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>	<p>i. PIU</p>
E	<p>INCIDENTS AND ACCIDENTS NOTIFICATION</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</p>	<p>i. Notify the Association no later than 48 hours after learning of the incident or accident. Provide available details upon request</p>	<p>i. PIU</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>available details of the incident or accident to the Association upon request</p> <p>Arrange for an appropriate review of the incident or accident to establish its immediate, underlying and root causes. Prepare, agree with the 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>ii. 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>	
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENT/MANAGEMENT TOOLS AND INSTRUMENTS</p> <p>i. Adopt and thereafter implement Somalia DRIVE Project Environmental and Social Management Framework (ESMF) which shall set out the principles, rules, guidelines, and procedures to assess the environmental and social risks and impacts for the implementation of the Project emanating from all known and potential activities it shall support through the beneficiary agencies, and which shall be consistent with the relevant ESS's.</p> <p>ii. In accordance with the ESMF, undertake site-specific environmental and social risk screening, site-specific impact assessments, and management plans for subprojects including assessment of the physical and biological environment, location of the selected infrastructure for upgrading/value chains, ensuring equity and inclusivity of infrastructure selections as well as the capacity of likely contractors to implement ESMPs and monitoring arrangements.</p>	<p>i. Adopt prior to project effectiveness. Thereafter implement the ESMF throughout project implementation.</p> <p>ii. Prior to the implementation of site-specific subprojects.</p>	<p>i. PIU</p> <p>ii. PIU</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.4	<p>MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the relevant aspects of the ESCP, including the relevant E&S documents and/or plans, ESMP, LMP, GBV Action 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.</p>	<p>i. Prior to the preparation of procurement documents and in the final contracts.</p> <p>ii. PIU to ensure all relevant ESS clauses are included and budgeted for before signing of contracts.</p>	<p>i. PIU</p>
1.5	<p>MONITORING AND INSPECTION</p> <p>i. Continuously monitor environmental and social risks and their impacts on the environment, Project-affected communities, and workers to ensure effective compliance in accordance with, <i>inter alia</i>, the ESMF, SEP, LMP, ESHS instruments, conditions of approval, capacity, and reporting requirements as set out in this ESCP and take necessary remedial actions acceptable to the Association.</p>	<p>i. Throughout the Project Implementation</p>	<p>i. PIU</p>
1.6	<p>EXCLUSION CRITERIA</p> <p>i. The following types of activities are ineligible for financing under the Project:</p> <ul style="list-style-type: none"> • Any activities resulting or anticipated to result in permanent or temporary physical or economic displacement. • Any activities involving adverse impacts on biodiversity conservation and sustainable management of living natural resources. • Any activities that have adverse impacts on cultural heritage as defined under ESS 8. 	<p>i. Throughout the Project Implementation</p>	<p>i. PIU</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<ul style="list-style-type: none"> Any activities that, due to the nature and scale of the activities, would result in a wide range of significant adverse impacts and risks, which are long-term, permanent, and/or irreversible, impossible to avoid entirely, and cannot be mitigated or required complex, unproven mitigation and excessive associated costs, rendering its risk classification as high. Production or trade in any product or activity deemed illegal under the Recipient's laws or regulations or ratified international conventions and agreements. Production or trade-in pesticides/herbicides subject to international phase-outs or bans. Any activities that would curtail workers' fundamental rights. These would include: (i) freedom of association and the effective recognition of the right to collective bargaining; (ii) prohibition of all forms of forced or compulsory labor; (iii) prohibition of child labor, including without limitation the prohibition of persons under 18 from working in hazardous conditions (which includes construction activities), persons under 18 from working at night, and that persons under 18 be found fit to work via medical examinations; (iv) elimination of discrimination in respect of employment and occupation, where discrimination is defined as any distinction, exclusion or preference based on race, color, sex, religion, political opinion, national extraction, or social origin. Production or activities that impinge on the lands owned, or claimed under adjudication, by indigenous peoples, without full documented consent of such peoples. Any other excluded activities as set out in the ESMF for the Project. 		
1.7	<p>PERMIT, CONSENTS, AND AUTHORIZATIONS</p> <p>i. Ensure that all project activities obtain all requisite permits, consents, and authorizations from relevant national authorities that apply to subprojects that they shall support and that these agencies comply with the conditions established in these permits, consents, and authorizations.</p>	<p>i. Valid throughout project implementation.</p>	<p>i. PIU</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.8	<p>TECHNICAL ASSISTANCE</p> <p>Ensure that any consultancies, studies, capacity building, training, and any other technical assistance activities under the Project are carried out in accordance with terms of reference acceptable to the Association and that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.</p>	ii. Throughout project implementation and prior to contracting the relevant activities.	PIU
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES (LMP)</p> <p>i. Adopt and implement Somalia DRIVE LMP to address labor risks compliant with ESS 2 requirements in form and substance acceptable to the Association, including (but not limited to):</p> <ul style="list-style-type: none"> • conditions of service; • code of conduct; • occupational, health and safety (OHS) measures; • prevention of child and forced labor; • emergency preparedness and response; • Grievance Mechanism for project workers; • training of project workers on key issues including OHS and GBV prevention; and management of labor influx. 	Prior to project activities	i. PIU
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>i. Adopt and implement SERP project Grievance Mechanism for direct and contracted workers, as outlined in the LMP as well as a confidential mechanism for SEA/SH complaints.</p>	i. Worker's grievance mechanism to be operational three months after effectiveness and to be maintained throughout Project implementation.	i. PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
2.3	OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES i. Adopt and implement OHS measures under the SERP project	i. Prior to requesting bids from contractors.	i. PIU
2.4	EMERGENCY PREPAREDNESS AND RESPONSE i. As part of the OHS measures specified in 2.3, include a detailed plan on emergency preparedness and response to cover project workers and ensure coordination with measures specified under 4.4 below.	i. EPR plans to be prepared prior to engaging Project workers and commencement of project activities and maintained throughout project implementation.	i. PIU
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	i. Prepare, adopt, and implement measures and actions to assess and manage specific risks and impacts on resource efficiency and pollution prevention and management to the community arising from the activities they finance through the beneficiary agencies. These measures shall be included in the subproject Environmental and Social Management Plans (ESMPs) and the Summary Project Reports (SPRs) or Comprehensive Project Reports (CPRs) in accordance with ESS3 requirements, and national laws, in a manner acceptable to the Association.	i. Throughout project implementation	i. PIU
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	COMMUNITY HEALTH AND SAFETY i. Adopt and implement measures and actions identified in the Somalia DRIVE ESMF to manage community health and safety risks	i. Prepare, adopt and publicly disclose the site-specific-ESMPs prior to	i. PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
		<p>implementation of site-specific subprojects</p> <p>ii. Monitor implementation throughout Project implementation.</p>	
4.2	<p>COMMUNITY HEALTH AND SAFETY</p> <p>i. Through the ESMF, develop measures to assess and manage specific risks and impacts on community health and safety arising from project activities that they finance, and include these measures in the ESMPs, and SPRs or CPRs, in accordance with the ESS4 requirements and the national laws and regulations, in a manner acceptable to the Association.</p>	<p>i. Throughout project implementation</p> <p>ii. As part of the project ESMF is a condition of project effectiveness.</p>	<p>i. PIU</p> <p>ii. PIU</p>
4.3	<p>GBV (SEA and SH) RISKS</p> <p>i. Adopt and implement the Somalia Drive GBV Action Plan setting forth measures and actions to assess and manage the risks of GBV arising in connection with the Project and establish GBV reporting channels and survivor-centric referral pathways .</p>	<p>i. As part of the ESMF, as a condition of effectiveness.</p>	<p>i. PIU</p>
4.4	<p>SECURITY MANAGEMENT</p> <p>i. Adopt and implement the SERP security management plan</p>	<p>i. Throughout project implementation.</p>	<p>i. PIU</p>
4.5	<p>SECURITY PERSONNEL</p>	<p>i. 3 months after project effectiveness and prior to</p>	<p>i. PIU</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>i. The following measures shall be adopted, to ensure that the engagement of military and security personnel for the provision of security to Project workers, sites, and/or assets (if required by the project), is carried out in accordance with the ESSs:</p> <p>a) Assess the risks and impacts of engagement of the military and security personnel as part of the assessment referred to in action 1.2 above, and incorporate and implement measures to manage such risks and impacts in relation to hiring, rules of conduct, training, equipping, and monitoring of such security personnel as part of the security management plans referred to in 4.4, above. .</p> <p>b) Adopt and enforce standards, protocols, and codes of conduct for the selection and use of military and security personnel and screen such 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> <p>c) Ensure that PIU signs a memorandum of understanding (MoU), with the Ministry of Security setting out the arrangements for the engagement of the military and security personnel under the Project, including compliance with the relevant requirements of this ESCP.</p> <p>d) Ensure that such personnel is adequately instructed and trained, prior to deployment and on a regular basis, on the use of force and appropriate conduct (including in relation to civilian-military engagement, SEA and SH, and other relevant areas), as set out in the Project Operational Manual and ESMF.</p> <p>e) Ensure that the stakeholder engagement activities under the Stakeholder Engagement Plan (SEP) include a communication strategy on the involvement of military and security personnel under the Project.</p> <p>f) Ensure that any concerns or grievances regarding the conduct of military and security personnel are received, monitored, documented (taking into account the need to protect confidentiality), resolved through the Project’s grievance mechanism. security-related incidents shall be reported to the Association in accordance with action B of this ESCP. Where the Association shall require, after consultation with the</p>	<p>engaging security personnel.</p> <p>ii. Throughout project implementation</p>	

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Recipient: (i) promptly appoint a third-party monitor consultant, with terms of reference, qualifications, and experience satisfactory to the Bank, to visit and monitor the Project area where military and security personnel are deployed, collect relevant data and communicate with Project stakeholders and beneficiaries; (ii) require the third-party monitor consultant to prepare and submit monitoring reports, which shall be promptly made available to and discussed with the Association; and (iii) promptly take any actions, as may be requested by the Association upon its review of the third-party monitor consultant reports.		
4.6	TRAINING FOR THE COMMUNITY i. MoF shall carry out training to heighten awareness of risks and impacts of project activities on local communities, as well as means to mitigate these risks and impacts. Training topics may include stakeholders mapping and engagement, Grievance Management, Occupational Health and Safety measures, Community Health and Safety issues	i. Within 3 months of project commencement.	i. PIU
4.7	GRIEVANCE MECHANISM FOR THE COMMUNITY ii. MoF shall put in place a community grievance redress mechanism consistent with ESS10.	i. Throughout project implementation	i. PIU
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE, AND INVOLUNTARY RESETTLEMENT			
5.1	i. In accordance with action 1.5 above, any activities resulting or anticipated to result in permanent or temporary physical or economic displacement shall be ineligible for Project financing as outlined in excluded activities in ESS 1.	i. Screening to be done during subproject appraisal.	i. PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	ii. Screen subprojects to exclude subprojects with land acquisition and resettlement impacts in accordance with the ESMF. The screening mechanism shall also include a protocol requiring subproject application to include documentation that the beneficiary agencies or downstream recipients own any land they will use or will acquire land exclusively on a willing buyer/willing seller basis.	ii. Screening and record keeping mechanism developed as part of the ESMF.	i. PIU
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	i. Not relevant	i.	i.
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	i. Conduct screening and community consultation at each sub-project area and confirm the presence or absence of IP/Sub-Saharan Historically Underserved Traditional Local Communities as per ESS7 to determine the applicability of the standard. If ESS7 groups are found in implementation areas, then IPPPs shall be prepared.	i. In each area before the implementation of sub-projects.	i. PIU
ESS 8: CULTURAL HERITAGE			
8.1	CULTURAL HERITAGE AND CHANCE FINDS i. 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.	i. Prepare, adopt and publicly disclose the ESMPs prior to implementation of site-specific subprojects	i. PIU
ESS 9: FINANCIAL INTERMEDIARIES			
9.1	Not relevant as Somaliland is implementing activity under component 2 only		i.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN (SEP) PREPARATION AND IMPLEMENTATION</p> <p>Adopt and implement a Stakeholder Engagement Plan (SEP), consistent with ESS10, which shall include measures to, inter alia, provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.</p>	Develop and adopt the SEP by project effectiveness, and thereafter implement the SEP throughout Project implementation	i. PIU
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>i. Update and Implement the existing SERP Project Grievance Mechanism.</p> <p>ii. Accessible grievance arrangements shall be made publicly available to receive and facilitate the resolution of concerns and grievances in relation to the Project, consistent with ESS10, in a manner acceptable to the Association.</p>	<p>i. Two months after Project effectiveness.</p> <p>ii. Throughout project implementation.</p>	i. PIU
CAPACITY SUPPORT (TRAINING)			
11.1	<p>i. Conduct refresher training and mentorship on The World Bank’s ESF in general;</p> <ul style="list-style-type: none"> • Stakeholder mapping and engagement; • Training in monitoring and supervision of the implementation of E&S instruments. • Occupational and Community Health and Safety issues • Labor Management; • Specific aspects of environmental and social assessment including preparation of E&S instruments such as ESMF and ESMPs, • Gender Based Violence (GBV); and • Grievance Management. 	<p>i. Training shall be carried out throughout the Project as required in accordance with the capacity assessment.</p>	i. PIU