

REPUBLIC OF SOMALILAND

**Eastern Africa Regional Digital Integration Project
(P176181)**

ENVIRONMENTAL and SOCIAL COMMITMENT PLAN (ESCP)

March 13, 2023

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Somaliland (the Recipient) will implement the Eastern Africa Regional Digital Integration Project (the Project), with the involvement of the Ministry of Information and Communication Technology (MICT) as set out in the Financing Agreement. The International Development Association (the Association) has agreed to provide financing for the Project as set out in the referred agreement.
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 Grant Agreement. 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, the timeframes of the actions and measures, institutional, staffing, training, monitoring, and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, and in form and substance, and in a manner acceptable to the Association. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the Association.
4. As agreed by the Association and the Recipient, this ESCP will be revised from time to time if necessary, during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the Recipient, through the MICT (Mr. Sahardiid Ahmed Ali – Interim Focal Point) and the Association agrees to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient's Minister of MICT. The Recipient shall promptly disclose the updated ESCP.

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 instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanisms.</p> <p>Carry out annual Environmental and Social audits for sub-projects financed by the Eastern Africa Regional Digital Integration Project in Somaliland to establish compliance with the Project's E&S instruments. These shall be reviewed and cleared by the Association.</p>	<p>Submit quarterly reports to the Association throughout the first year of Project implementation, commencing after the Effective Date and biannually thereafter throughout Project implementation. Submit each report to the Association no later than 21 days after the end of each reporting period.</p>	<p>National Project Implementation Unit (PIU) at the MICT</p>
B	<p>INCIDENTS AND ACCIDENTS</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, including, <i>inter alia</i>, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injuries. Provide sufficient details regarding the scope, severity, and possible causes of 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/or supervising entity, as appropriate. Subsequently, as per the Association's request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.</p>	<p>Notify the Association within 48 hours after learning of the incident or accident using such reporting formats as the Association may specify.</p> <p>A detailed report of the incident shall be provided within fifteen (15) days of notifying the Association of the incident or accident, unless a different timeline is agreed with the Association.</p>	<p>National PIU at the MICT</p>

C	<p>CONTRACTORS MONTHLY REPORTS</p> <p>Require contractors and supervising firms to provide monthly monitoring reports on ESHS performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the Association.</p>	<p>Submit the monthly reports to the Association as annexes to the reports to be submitted under action A above.</p>	<p>National PIU at the MICT</p>
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D	<p>NOTIFICATIONS RELATING TO DAAB COMPLIANCE REVIEW OF CONTRACTOR COMPLIANCE WITH SEA/SH PREVENTION AND RESPONSE OBLIGATIONS</p> <p>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 sexual exploitation and abuse (SEA), and/or sexual harassment (SH) 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>No later than 15 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>National PIU at the MICT</p>
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ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL SOCIAL RISKS AND IMPACTS

1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>Establish and maintain an organizational structure within the PIU at the MICT with qualified staff and resources to support management of ESHS risks and impacts of the Project including one full-time Environmental and Social Specialist.</p>	<p>Establish a PIU no later than four weeks after the Effective Date, with one full-time Environmental and Social Specialist, and maintain throughout Project implementation.</p>	<p>National PIU at the MICT</p>
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1.2	<p>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</p> <ol style="list-style-type: none"> 1. Prepare, disclose, consult upon, adopt and implement an Environmental and Social Management Framework (ESMF) for the Project, consistent with the relevant ESSs, which shall include, as annexes, the Labor Management Procedures (LMP), the Resettlement Policy Framework (RPF), SEA/SH Prevention and Response Action Plan (SEA/SH PRAP), Security Risk Assessment Management Framework (SRAMF), and an E-Waste Management Plan (EWMP). 2. Prepare, disclose, consult upon, adopt and implement site-specific Environmental and Social Impact Assessments (ESIAs), Environmental and Social Management Plans (ESMPs) as set out in the ESMF, including detailed measures necessary for the installation of Project's fixed line components, including shore approaches for long distance fiber optic cables, and access roads to transmission towers and other fixed infrastructure. The activities described in the exclusion list set out in the ESMF shall be ineligible to receive financing under the Project. 	<p>ESMF (incorporating LMP, SEA/SH-PRAP, SRAMF, and EWMP) shall be prepared, disclosed, consulted upon and adopted before Effective Date, and thereafter implement the ESMF throughout Project implementation.</p> <p>Adopt the ESMP before launching the bidding process for the respective Project activity that requires the adoption of such ESMP. Once adopted, implement the respective ESMP throughout Project implementation.</p>	<p>National PIU at the MICT</p>
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1.3	<p>MANAGEMENT OF CONTRACTORS:</p> <p>Incorporate the relevant aspects of the ESCP, including, <i>inter alia</i>, the relevant E&S instruments, the LMP, Security Risk Assessment Management Framework, 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.</p>	<p>As part of the preparation of procurement documents and respective contracts. Supervise contractors throughout Project implementation.</p>	<p>National PIU at the MICT</p>
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1.4	<p>TECHNICAL ASSISTANCE</p> <p>Ensure that the consultancies, studies (including feasibility studies), capacity building, training, and any other technical assistance activities under the Project are carried out in accordance with terms of reference (TORs) acceptable to the Association, and are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.</p>	<p>Throughout Project implementation.</p>	<p>National PIU at the MICT</p>
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1.5	<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 and 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 the environment. • Activities that may adversely affect lands or rights of Traditional Local Communities or other vulnerable and marginalized groups. 		
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	<ul style="list-style-type: none"> • 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 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. 		
1.6	<p>CONTINGENT EMERGENCY RESPONSE (CERC) FINANCING Ensure that activities and other technical assistance activities under the CERC are carried out in accordance with terms of reference acceptable to the Association, that are consistent with the ESSs</p>	Prior to implementation of activities under CERC	National PIU at the MICT

ESS 2: LABOUR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES (LMP)</p> <p>Adopt and implement the Labor Management Procedures (LMP), which shall be prepared as part of the ESMF, for the Project and government requirements including, <i>inter alia</i>, provisions on working conditions, management of workers relationships, occupational health and safety (including personal protective</p>	Adopt the LMP prior to the Effective Date, and thereafter implement the LMP throughout Project implementation.	National PIU at the MICT

	equipment, and emergency preparedness and response), code of conduct (including relating to SEA and SH), forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms.		
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Establish, maintain, and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.</p>	Establish grievance mechanism prior to engaging Project workers, and thereafter maintain and operate it throughout Project implementation.	National PIU at the MICT
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 and ESMPs including through, <i>inter alia</i>, implementing adequate OHS measures and incorporating LMP and SRAMF and SEA/SH PRAP 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.	National PIU at the MICT

ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT

3.1	<p>E-WASTE MANAGEMENT PLAN</p> <p>Adopt and implement an E-Waste Management Plan (EWMP), as part of the ESMF, to manage hazardous and non-hazardous wastes, including proper management of construction wastes generated during excavation for fiber laydown and/or access road construction consistent with ESS3.</p>	Same timeframe as under Section 1.2 (1) above.	National PIU at the MICT
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3.2	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p> <p>Resource efficiency and pollution prevention and management measures shall be incorporated in the ESMF and area specific ESMPs to be prepared under the clause 1.2 above.</p>	Same timeframe as under Section 1.2 (1) and 1.2 (2) above, respectively.	National PIU at the MICT
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>TRAFFIC AND ROAD SAFETY</p> <p>Incorporate measures to manage traffic and road safety risks as required in the ESMPs to be prepared under action 1.2 above</p>	Same timeframe as under Section 1.2 (2) above.	National PIU at the MICT
4.2	<p>COMMUNITY HEALTH AND SAFETY</p> <p>Assess and manage specific risks and impacts to the community arising from Project activities [, including, inter alia,] [specify any areas of risks that may require emphasis, e.g., behavior of Project workers, risks of labor influx, response to emergency situations], and include mitigation measures in the ESMPs to be prepared in accordance with the ESMF.</p>	Same timeframe as under Section 1.2 (2) above.	National PIU at the MICT
4.3	<p>SEA AND SH RISKS</p> <p>Adopt and implement a SEA/SH PRAP as part of the ESMF, to assess and manage the risks of SEA and SH.</p>	Same timeframe as under Section 1.2 (1) above.	National PIU at the MICT
4.4	<p>SECURITY MANAGEMENT</p> <p>Assess and implement measures to manage the security risks of the Project, including the risks of engaging security personnel to safeguard project workers, sites, assets, and activities, as set out in the Security Risk Assessment and Management Framework (SRAMF), guided by the principles of proportionality and GIIP, and by applicable law, in relation to hiring, rules of conduct, training, equipping, and monitoring of such personnel.</p>	Same timeframe as under Section 1.2 (1) above.	National PIU at the MICT

ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	RESETTLEMENT POLICY FRAMEWORK: Adopt and implement a Resettlement Policy Framework (RPF) for the Project, consistent with ESS5.	Same timeframe as under Section 1.2 (1) above.	National PIU at the MICT
5.2	RESETTLEMENT PLANS Adopt and implement a resettlement action plan (RAP) for each activity under the Project for which the RPF requires such RAP, consistent with ESS5. Prepare, adopt, consult upon, publicly disclose and implement the RAP prior to implementation of the relevant Project activities, including ensuring that before taking possession of the land and related assets, full compensation has been provided, and as applicable, displaced people have been resettled and moving allowances have been provided.	Adopt the RAPs before launching the bidding process for the respective Project activity that requires the adoption of such RAPs. Once adopted, implement the respective RAPs throughout Project implementation.	National PIU at the MICT
5.3	GRIEVANCE MECHANISM Describe in the RPF and RAPs any distinctive feature as to how ESS5 related grievances will be handled.	Same timeframe as under Sections 5.1 and 5.2 above.	National PIU at the MICT
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	BIODIVERSITY RISKS AND IMPACTS Incorporate biodiversity screening and due diligence, in accordance with Exclusion List for activities that have an adverse impact on biodiversity and natural habitats as part of ESMF and ESMPs, as defined in Section 1.5.	Same timeframe as under Sections 1.2 (1) and 1.2 (2) above.	National PIU at the MICT
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			

7.1	<p>1. Prepare, disclose, consult upon, and implement an Indigenous Peoples Planning Framework (IPPF) for the Project, consistent with ESS7.</p> <p>2. Prepare, disclose, consult upon, and implement an Indigenous Peoples Plan (IPP) for each activity under the Project for which the IPPF requires such IPP, consistent with ESS7.</p>	<p>1. Adopt the IPPF prior to the Effective Date, and thereafter implement throughout Project implementation.</p> <p>2. Adopt the IPPs prior to carrying out of any activity that requires the preparation of such IPP. Once adopted, implement the respective IPP throughout Project implementation.</p>	National PIU at the MICT
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ESS 8: CULTURAL HERITAGE

8.1	<p>CHANCE FINDS Describe and implement the requirements of ESS8 including Chance Finds procedures in ESMF and site-specific ESMPs. This procedure shall be followed if cultural heritage is encountered during Project activities. Ensure relevant workers shall be trained in the requirements of the procedure prior to ground disturbance during actual construction work.</p>	Same timeframe as under Sections 1.2 (1) and 1.2 (2) above, respectively.	National PIU at the MICT

ESS 9: FINANCIAL INTERMEDIARIES

This standard is not currently relevant, as the project has no financial intermediaries

ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE

10.1	<p>STAKEHOLDER ENGAGEMENT PLAN (SEP) PREPARATION AND IMPLEMENTATION</p> <p>The Recipient has prepared, disclosed, and adopted a Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, which includes 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. The Recipient shall conduct additional stakeholder consultations targeting communities and other disadvantaged groups and update the SEP and thereafter implement the SEP throughout project implementation.</p>	<p>SEP prepared, disclosed, and adopted.</p> <p>The Recipient shall carry out the additional consultations and update the SEP prior to the Effective Date and thereafter implement the SEP throughout Project implementation.</p>	National PIU at the MICT
10.2	<p>PROJECT GRIEVANCE MECHANISM:</p> <p>Establish, 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>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>	<p>Establish the grievance mechanism prior to Project appraisal and thereafter maintain and operate the mechanism throughout Project implementation.</p>	National PIU at the MICT

CAPACITY SUPPORT

<p>CS1</p>	<p>The Recipient shall assess the need for capacity enhancement in the management of environmental and social risks and thereafter develop and implement an Environmental and Social Risks Capacity Enhancement Action Plan.</p> <p>The Environmental and Social Risks Capacity Enhancement Action Plan shall include, among other things:</p> <ul style="list-style-type: none"> • Stakeholder mapping and engagement for the Project. • Occupational and community Health and Safety (OHS) issues that are important for the context of this Project and subsequent successor projects. • Preparation of ES instruments, including ESMPs, SESA and ESIA. • Preparation of guidelines, policies relevant to E&S. • Relevant studies in line with Bank ESS standards and international practices • Setting up of community of practice and resource centers • Screening, review and clearance of E&S instruments. • Gender Based Violence (GBV) and introduction to GRM. <p>The groups targeted for the capacity enhancement will include but not limited to:</p> <ul style="list-style-type: none"> • PIU in the Ministry of Communication and Technology (MICT), Republic of Somaliland. 	<p>The needs assessment shall be carried out during appraisal, and the Environmental and Social Risks Capacity Enhancement Action Plan shall be prepared and adopted no later than six months after the Effective Date and thereafter implemented (and updated if needed) throughout Project implementation in accordance with its terms.</p>	<p>National PIU at the MICT</p>
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	<ul style="list-style-type: none">• Consultants/sub-consultants and their Project workers.• Other key stakeholders as identified by the PIU and the MICT, in the Republic of Somaliland in the different sectors addressed by the Project.		
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