

# FEDERAL REPUBLIC OF SOMALIA



**Ministry of Energy and Water Resources**

**Horn of Africa - Groundwater for Resilience Project– Somalia  
(P174867)**

## **ENVIRONMENTAL and SOCIAL COMMITMENT PLAN (ESCP)**

March 23, 2022

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Federal Republic of Somalia (“Recipient”), will implement the **Somalia Horn of Africa - Groundwater for Resilience Project** (P174867) (hereinafter known as “**the Project**”) through its Ministry of Energy and Water Resources (MoEWR) at Federal level and Federal Member state level. 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 ESF and referred to in this ESCP, including:
  - a. Stakeholder Engagement Plan (SEP), Environmental and Social Management Framework (ESMF), Resettlement Policy Framework (RPF), which have been prepared for the Project; and
  - b. Labor Management Procedures (LMP), Sexual Exploitation, Abuse and Harassment (SEAH) Prevention and Response Plan, Project wide Security Management Plan (SMP) and Security Risk Assessment (SRA) and District Security Risk Assessments and Security Management Plans, , as well as site specific Environmental and Social Management Plans (ESMPs) and Security Management Plans, and any other plans and studies, including site or issue specific plans, procedures, guidelines prepared for subprojects and activities of the Project and the timelines specified in all of those E&S documents.
4. The Recipient is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by MOEWR or any party acting on its behalf or on behalf of the Recipient.
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 MoEWR 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 minister responsible for MoEWR. MoEWR 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 environmental or social 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, social, health and safety impacts, such as, inter-alia, labor influx, security risks to community, project personnel and assets, land acquisition and resettlement impacts, sexual exploitation, abuse and harassment (SEAH).

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<b>MONITORING AND REPORTING</b>			
A	<p><b>REGULAR REPORTING</b></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 this ESCP; status of preparation and implementation of E&amp;S documents required under the ESCP; stakeholder engagement activities; and functioning of the grievance mechanism(s).</p> <p>Require focal points for the Federal Member States to report to the Project Management Unit (NPCU)</p>	<p>Semi-annually throughout Project implementation period.</p> <p>On a monthly basis.</p>	<p>NPCU within the MoEWR,</p>
B	<p><b>INCIDENTS AND ACCIDENTS NOTIFICATION</b></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>Report all other incidents and accidents to the Association in a timely manner</p>	<p>Promptly and no later than 48 hours after taking notice of an incident or accident, using such reporting protocols and procedures as the Association may communicate.</p> <p>As per agreed time frame.</p> <p>As part of quarterly reports</p>	<p>NPCU</p>
C	<p><b>CONTRACTORS MONTHLY REPORTS</b></p> <p>As per the Association's request, provide to the Association the contractors' and design and supervision consultants' monthly monitoring reports on E&amp;S implementation submitted to the NPCU.</p> <p>NPCU to review contractor and private sector entities reports and escalate to the association any key issues throughout Project implementation.</p>	<p>Upon request by the Association.</p> <p>As part of quarterly reports unless an incident covered by B</p>	<p>NPCU</p>
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.1	<p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>Establish and maintain an organizational structure at Federal Government of Somalia (FGS) level with qualified staff and resources to support management of E&amp;S risks including appointing within the NPCU, a Project Coordinator, Procurement Specialist, Financial management Specialist Environmental Specialist, a GBV Specialist and a Social Specialist and a Security Specialist - each with more than eight (8) years of experience - to be full time dedicated to the Project.</p> <p>Establish and maintain an organizational structure at Federal Member State (FMS) level with qualified staff and resources to support management of E&amp;S risks including appointing within the SPIU, a full-time environmental specialist and a full time social/GBV specialist, each with more than five (5) years of experience in carrying out environmental and social assessments of infrastructure projects.</p> <p>Contract a competent security risk management firm and maintain throughout the project</p>	<p>Prior to disbursement of component 1. The specialists will be maintained throughout implementation of the Project.</p> <p>Prior to disbursement for activities under component 1 for respective FMS.</p> <p>Prior to disbursement of component 1</p>	<p>NPCU</p> <p>SPIU</p> <p>NPCU</p>
1.2	<p><b>ENVIRONMENTAL AND SOCIAL ASSESSMENT</b></p> <p>Prepare, consult upon, adopt and publicly disclose a Project wide SEAH Prevention and Response Plan, and LMP.</p> <p>Adopt ESMF disclosed on 27<sup>th</sup> March 2022.</p> <p>In accordance with the screening procedures enumerated in the ESMF and the provisions of project wide plans for this project, undertake site-specific environmental and social risk screening and impact assessments for subprojects including assessment of the physical environment, location of water infrastructure, sustainable availability of water for all affected users, availability of suitable land that is free of encumbrances and contestation or can be acquired/used in accordance with the RPF, ensuring equity and inclusivity of all groups including vulnerable groups in site and subproject selections - as well as assessment of the capacity of likely contractors to implement ESMPs and monitoring arrangements. Based on these assessments, prepare, consult adopt and disclose site/subproject specific</p>	<p>Prior to disbursement of component 1</p> <p>ESMPs approved and disclosed implementation arrangements in place prior to initiating the implementation of site-specific subprojects.</p>	<p>NPCU and SPIU</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	ESMPs and if needed voluntary land donations/ government mediated land agreements or RAPS.		
1.3	<p><b>MANAGEMENT TOOLS AND INSTRUMENTS</b></p> <p>Implement ESMF, RPF, SEP, SMP, SEAH Prevention and Response Plan and LMP.</p> <p>Update project wide SEP as necessary, and publicly disclose and implement, including Grievance Mechanism and Inclusion Plan satisfactory to the Association.</p> <p>Prepare Project wide SRA and SMP for Project implementation, a Project wide SEAH Prevention and Response Plan, and a Project wide LMP satisfactory to the Association.</p> <p>District wide SRAs and SMPs satisfactory to the Association</p> <p>Prepare, adopt and publicly disclose, sub-project construction and operation ESMPs including required elements of the SEAH Prevention and Response Plan, LMPs, Site specific Activity Security Plans and Resettlement Action Plan or Livelihood Restoration Plan (RAP/LRP) as specified in the ESMF and RPF in a manner satisfactory to the Association.</p>	<p>Throughout Project implementation, once these have been duly adopted.</p> <p>As needed throughout the Project. Prior to disbursement for activities under component 1.</p> <p>Plans approved and implementation arrangements in place before issuing Request for Proposals for the Contactors/executing agencies and implemented as of commencement of the sub-project in accordance with the respective schedule for implementing the mitigation measures contained in the instruments throughout the Project implementation.</p> <p>Plans approved and implementation arrangements in place before issuing Request for Proposals for the Contactors/executing agencies and implemented as of commencement of the sub-project in accordance with the respective schedule for implementing the mitigation measures contained in the instruments throughout the Project implementation.</p> <p>All disclosure and clearance of ESS instruments before calls for bids.</p>	NPCU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.4	<p><b>MANAGEMENT OF CONTRACTORS</b></p> <p>Incorporate the relevant aspects of the ESCP, including the relevant E&amp;S documents and/or plans, the LMP, SEAH Prevention and Response Plan and Project and District SRA and SMP, 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>Develop and implement procedures for managing contractors and subcontractors recruited to carry out civil works including inter alia:</p> <ul style="list-style-type: none"> <li>• Ensure compliance with the national laws, e.g. licenses to operate and excavate any sites for project purposes;</li> <li>• 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;</li> <li>• Preparation of a detailed contractor-ESMP (C-ESMP) that is costed, with sufficient budget to mitigate E&amp;S risks and demonstrates sufficient capacity to implement the required measures as part of the bidding process; <ul style="list-style-type: none"> <li>• Codes of conduct (CoCs) included in construction contracts for contractors, subcontractors, primary suppliers and their workers covering conditions of service, OHS, GBV and security requirements;</li> </ul> </li> <li>• Monitor contractor commitment and compliance with ESSs;</li> <li>• Provide GRM for contractor and subcontractor, primary suppliers, communities and other stakeholders as well as employees; <ul style="list-style-type: none"> <li>• Require contractors to provide GRM for workers</li> </ul> </li> <li>• 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</li> <li>• 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 ESMF, SEP, LMP, Sexual Exploitation, Abuse and Harassment (SEAH) Prevention and Response Plan, and Security Management Plan and site-specific assessments and plans</li> </ul>	<p>Prior to the preparation of procurement documents and in the final contracts PIU to ensure all relevant ESS clauses are included and budgeted for before signing of contracts.</p> <p>Supervise contractors throughout Project implementation.</p>	<p>NPCU</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.5	<p><b>MONITORING AND INSPECTION</b></p> <p>MoEWR shall continuously monitor environmental and social risks and impacts on the environment, Project-affected communities and workers to ensure effective compliance in accordance with 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>	Throughout the Project Implementation	NPCU, SPIU and quality enhancement firm.
1.6	<p><b>IMPLEMENTATION OF PROJECT ACTIVITIES IN SOMALILAND</b></p> <p>Before financing project activities in Somaliland (a) the E&amp;S instruments shall be adapted for Somaliland and the Recipient shall ensure that (a) the Somaliland Manual has been adopted which: (i) includes institutional arrangements and responsibilities for assessing and managing E&amp;S risks and impacts, with a description of the ESHS assessment and management arrangements; and (ii) includes or refers to E&amp;S instruments and plans referred to in paragraph 1.2 above; and (b) the Recipient shall demonstrate that institutional arrangements, satisfactory to the Association as shall be required for carrying out the Project in Somaliland - including managing the Project's E&amp;S risks - are in place; all in accordance with the ESSs.</p>	Before disbursement of funds or initiation of implementation of any Project activities in Somaliland.	
1.7	<p><b>EXCLUSION CRITERIA</b></p> <p>The following types of activities are ineligible for financing under the Project:</p> <ul style="list-style-type: none"> <li>• Activities that may cause long term, permanent and/or irreversible environmental or social impacts (e.g. loss of major natural habitat, significant influx, food insecurity, water scarcity, indirect physical displacement)</li> <li>• Activities that have a high probability of causing serious adverse effects to human health and/or the environment Such as risk of violence, significant resource restrictions, elite capture and discriminatory exclusion.</li> <li>• Activities that may have significant adverse social impacts and/ or may give rise to significant social conflict Such as disputes over land or access to water.</li> <li>• Activities that may involve significant physical resettlement or extensive economic displacement or loss of livelihoods –more than 10 vulnerable HH)</li> <li>• Activities that may impact on known cultural heritage sites including sites that are important to local communities.</li> </ul> <p>Any other excluded activities as set out in the ESMF for the Project and informed by consultations with Stakeholders.</p>	Throughout the Project Implementation	NPCU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.8	<p><b>TECHNICAL ASSISTANCE</b></p> <p>Ensure that the consultancies, studies (including feasibility studies, if applicable), capacity building, training, and any other technical assistance activities under the Project are: (1) carried out in accordance with terms of reference acceptable to the Association that are consistent with the ESSs; and thereafter ensure that the outputs of such activities comply with the terms of reference; and (2) that working conditions for all workers providing services under TA activities are in accordance with ESS2 and Somali Law, including OHS, safety and access to a workers' grievance mechanism, and the Project LMP once approved.</p>	Throughout the Project Implementation	NPCU
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
2.1	<p><b>LABOR MANAGEMENT PROCEDURES (LMP)</b></p> <p>Develop LMP to address labor risks, including (but not limited to)</p> <ul style="list-style-type: none"> <li>▪ conditions of service;</li> <li>▪ code of conduct;</li> <li>▪ occupational, health and safety (OHS) measures;</li> <li>▪ Covid-19 prevention measures;</li> <li>▪ prevention of child and forced labor;</li> <li>▪ emergency preparedness and response;</li> <li>▪ grievance redress mechanism for project workers;</li> <li>▪ training of project workers on key issues including OHS and GBV prevention; and</li> <li>▪ management of labor influx.</li> </ul>	Prior to disbursement of component 1.	NPCU
2.2	<p><b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b></p> <p>Develop and maintain a for direct and contracted workers, as outlined in the LMP as well as a confidential mechanism for GBV/SEAH complaints.</p>	Prior to workers being hired	NPCU SPIU
2.3	<p><b>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</b></p> <p>Develop and implement occupational, health and safety (OHS) measures, based on World Bank EHS Guidelines, as part of the LMP including through, inter alia, implementing adequate OHS measures and incorporating SMP, SEAH Prevention and Response Plan requirements into the ESHS specifications of the procurement documents and contracts with contractors.</p>	Prior to disbursement of component 1.	NPCU
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			



MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
3.1	<p><b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT:</b></p> <p>Resource efficiency and pollution prevention and management measures will be covered under the ESMPs to be prepared under the clause 1.3 above.</p>	<p>In accordance with the ESMF, prepare, adopt and publicly disclose the ESMPs prior to implementation of site-specific subprojects.</p> <p>Monitor implementation of the ESMPs throughout Project implementation.</p>	NPCU
3.2	<p><b>Depletion of ground water resources</b></p> <p>Install a water discharge meter for the boreholes at the point of water abstraction to record the daily volume of water abstracted, and Install the dip tube for the boreholes to monitor the ground water level for the drilled boreholes periodically.</p>	As per ESMF prior to handing over of the boreholes to the communities for use and throughout project implementation	NPCU
3.3	<p><b>Ensuring Potable Water</b></p> <p>All water sources developed by the Project shall be subjected to the water quality tests for the physio-chemical and microbiology parameters to ensure all parameters meet the WHO Potable water drinking standards before handing over to the community.</p> <p>Undertake periodic water quality tests for the physio-chemical and microbiology parameters.</p>	<p>Prior to handing over of the boreholes to the Communities for use.</p> <p>Quarterly throughout the Project Implementation.</p>	NPCU, SPTs
3.4	<p><b>AQUIFER SUSTAINABILITY</b></p> <p>Potential interventions (boreholes and wells) will be subject to prior knowledge corresponding aquifer sustainability assessment approved by the Association, to ensure that the proposed investment will not compromise the sustainability of the resource or have negative externalities or have transboundary negative externalities or impacts on watersheds beyond the assessed impacts described in the OP7.50 memo as notified to the riparian countries.</p>	A pre-requisite or part of the site specific ESIA	NPCU
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
4.1	<p><b>COMMUNITY HEALTH AND SAFETY</b></p> <p>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</p>	In accordance with the ESMF, prepare, adopt and publicly disclose the site specific-ESMPs prior to call for bids	NPCU

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>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.</p>	<p>Monitor implementation throughout Project implementation.</p>	
<p>4.2 <b>GBV AND SEAH RISKS</b></p> <p>Prepare, consult upon, adopt, publicly disclose and implement a stand-alone project-wide Sexual Exploitation, Abuse and Harassment (SEAH) Prevention and Response Plan.</p> <p>Key measures include:</p> <ul style="list-style-type: none"> <li>▪ 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/SEA provisions;</li> <li>▪ Mapping and development of partnerships with identified GBV service providers;</li> <li>▪ A Reporting and Response Framework that outlines key requirements for reporting cases if they arise and measures to enable safe, ethical, survivor-centered response;</li> <li>▪ An Accountability Framework that outlines how the NPCU/contractor will handle allegations, including related to investigation (in alignment with national processes) and sanctions for potential perpetrators; and</li> <li>▪ Establishment of channels/procedures for safe, confidential and survivor centered reporting of GBV incidence that connect to the project GRM and enable training of GRM operators on how to respond to cases that come forward.</li> </ul> <p>Development of additional protection measures to address potential sexual harassment in recruitment practices and in the workplace.</p> <p>Clarification of GBV requirements in bidding documents and construction contracts the requirements for CoCs, training of workers, and how GBV related costs will be covered in the contract.</p> <p>Bid evaluations to include consideration for GBV response proposals.</p> <p>Ensuring additional funds are made available to implement measures to address GBV/SEA risks and impacts that may arise during Project implementation.</p>	<p>Prepare, consult upon, adopt and publicly disclose prior to disbursement of component 1 and thereafter implement throughout project implementation period.</p>	<p>NPCU</p>
<p>4.3 <b>SECURITY PERSONNEL:</b></p>		

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<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 Association.</p> <p>Prepare, adopt and implement district Security Risk Assessments and Security Management Plans consistent with the requirements of ESS4, in a manner acceptable to the Association.</p> <p>Prepare, adopt and implement Site specific Security Risk Assessments and Security Management Plans consistent with the requirements of ESS4, in a manner acceptable to the Association.</p> <p>The following measures shall be adopted, to ensure that the engagement of military and security personnel for provision of security to Project workers, sites and/or assets, is carried out in accordance with the ESSs:</p> <ul style="list-style-type: none"> <li>a) Assess the risks and impacts of engagement of the military and security personnel as part of the assessment referred to in action 1.3 c) above, and implement measures to manage such risks and impacts, a Security Management Plan, guided by ESS4, the principles of proportionality and GIIP, and by applicable law, in relation to hiring, rules of conduct, training, equipping, and monitoring of such security personnel.</li> <li>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.</li> <li>c) Ensure that PIU signs a memorandum of understanding (MoU), with the Ministry of Security and the NISA 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.</li> <li>d) Ensure that such personnel are adequately instructed and trained, prior to deployment and on a regular basis, on the use of force and appropriate conduct (including in relation</li> </ul>	<p>Prior to disbursement for component 1.</p> <p>Prior to on the site verification of project sites.</p> <p>Prior to issuing bidding documents for contractors for activities under component 1.</p> <p>Prior to commencement of the works bidding process for contractors in the specific district.</p>	<p>NPCU</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	<p>to civilian-military engagement, SEA and SH, and other relevant areas), as set out in the Project Operational Manual, SMP, Security Management Plan and LMP.</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 Borrower: (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.</p>		
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>			
5.1	<p><b>RESETTLEMENT ACTION PLANS</b></p> <p>Adopt RPF disclosed on 27 March 2022 and in accordance with the RPF, prepare, adopt and publicly disclose, site specific Resettlement Action Plans (RAPs) or Livelihood Restoration Plans (LRPs) and voluntary land donation requirements/government mediated land agreements in accordance with ESS5 and consistent with the requirements of the RPF in a manner acceptable to the Association; and</p> <p>Thereafter, implement the respective RAPs and LRPs, in a manner acceptable to the Association.</p>	Voluntary land donation requirements and land agreement documents and RAPs/ LRPs to be prepared, adopted and publicly disclosed and approved prior to bidding and implemented prior to initiation of works.	NPCU
5.2	<p><b>FORCED DISPLACEMENT PRIOR TO PROJECT APPROVAL</b></p>		NPCU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	<p>All land acquisition for the Project is expected to be carried out as outlined in item 5.1 above. In the exceptional case where subproject assessment and due diligence identifies that involuntary resettlement or forced displacement occurred in anticipation of construction or in any other project-financed infrastructure before board approval of the Project, or in the absence of a RAP/LRP prepared in a manner acceptable to the Association, the subproject will be ineligible unless the relevant ESS5 requirements can be satisfied retroactively and the Association specifically authorizes such retroactive application.</p> <p>Otherwise, the Association will not support such infrastructure development and the subproject will not be eligible for inclusion in the Project.</p>	Screening and census survey during the RAP process for subprojects to verify whether any prior forced displacement occurred and acceptable retroactive requirements to be included in the respective RAP prior to approval of the subproject and call for bids. Retroactive measures implemented as part of the RAP.	
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
6.1	<p><b>BIODIVERSITY RISKS AND IMPACTS</b></p> <p>Consistent with the ESMF, ensure that ESS6 screening is carried out and -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 initiation implementation of site-specific subprojects.</p> <p>Carry out the ESMP throughout Project implementation.</p>	NPCU
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>			
	<p>Based on the WB's due diligence report on the applicability of the standard, The MoEWR will carry out sub-project level assessments that identify the presence of indigenous peoples/sub-Saharan African historically underserved traditional local communities in the project intervention area and where found will prepare indigenous people's plans in a manner acceptable to the Association.</p>	<p>Prior to initiation any activities in an area</p> <p>In each area before the implementation of sub-projects.</p>	NPCU
<b>ESS 8: CULTURAL HERITAGE</b>			
8.1	<p><b>CULTURAL HERITAGE AND CHANCE FINDS</b></p> <p>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.</p>	Prepare, adopt and publicly disclose the ESMPs prior to implementation of site-specific subprojects	NPCU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	Implement - if applicable - the chance finds procedure described in the ESMF which will be included in site-specific ESMPs.	Carry out the ESMPs, including complying with chance finds procedures, throughout Project implementation.	
<b>ESS 9: FINANCIAL INTERMEDIARIES</b>			
	Not relevant to the project		
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<b>STAKEHOLDER ENGAGEMENT PLAN (SEP) PREPARATION AND IMPLEMENTATION</b> Adopt SEP disclosed on 27 <sup>th</sup> March 2022 and implement the SEP, in a manner acceptable to the Association.	Throughout Project implementation.	NPCU
10.2	<b>PROJECT GRIEVANCE MECHANISM</b> Establish and operationalize a trusted and accessible Project Grievance Mechanism, as described in 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.	Prior to disbursement for component 1 and maintain throughout the project	NPCU
<b>CAPACITY SUPPORT (TRAINING)</b>			
CS1	A preliminary capacity assessment for the implementation of the E&S requirements has been carried out as part of the ESMF preparation and will be updated as necessary following the recruitment and induction of E&S specialists. The capacity assessment will include terms of reference, an action plan and timeline for capacity building activities, including training and mentorship, in the following areas: <ul style="list-style-type: none"> <li>• The World Bank's ESF in general;</li> <li>• Stakeholder mapping and engagement;</li> <li>• Occupational and Community Health and Safety issues (such as OHS measures in rehabilitation, construction and maintenance);</li> <li>• Labor Management;</li> <li>• Specific aspects of environmental and social assessment including preparation of E&amp;S instruments such as ESMPs, RAPs and LRPs, Sexual Exploitation, Abuse and Harassment (SEAH) Prevention and Response Plans, Security Management Plans;</li> <li>• Gender Based Violence (GBV); and</li> </ul>	Prior to implementation for activities under component 1  Training will be carried out throughout the Project as required.	NPCU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	<ul style="list-style-type: none"> <li>• Grievance Management;</li> <li>• Security and water management.</li> </ul> <p>Targeted groups will include the following:</p> <ul style="list-style-type: none"> <li>• NPCU in the MoEWR;</li> <li>• State level SPIU;</li> <li>• Contractors/subcontractors/primary suppliers and their project workers;</li> <li>• Village Development committees (VDCs);</li> <li>• Quality Enhancement and Institutional Strengthening firm;</li> <li>• Beneficiary communities; and</li> <li>• Key stakeholders.</li> </ul>		