



HARGEISA LOCAL GOVERNMENT

GOVERNMENT OF SOMALILAND

SOMALIA URBAN RESILIENCE PROJECT (SURP II- P170922)

NAGAAD PROJECT

RESETTLEMENT FRAMEWORK

Prepared for SURP II (July 2029)

Updated for

SURP II Second Additional Financing (April 2022)

SURP II Third Additional Financing (August 2024)

SURP II Fourth Additional Financing (July 2025)

Auguts 2025

TABLE OF CONTENTS

TABLE OF CONTENTS.....	I
LIST OF TABLES	III
ACRONYMS AND ABBREVIATIONS.....	IV
DEFINITION OF TERMS USED IN THE REPORT	VI
EXECUTIVE SUMMARY	1
1 INTRODUCTION.....	8
1.1 BACKGROUND.....	8
1.2 PROJECT DEVELOPMENT OBJECTIVE:	8
1.3 PROJECT COMPONENTS AND PROGRESS.....	9
1.4 ACTIVITIES TO BE FINANCED UNDER AF4	9
1.5 IMPLEMENTATION ARRANGEMENTS	11
1.6 IMPLEMENTATION STATUS AND ACHIEVEMENTS TO DATE	11
1.7 ENVIRONMENTAL AND SOCIAL BENEFITS	14
1.8 LAND USE AND ANTICIPATED RESETTLEMENT IMPACTS.....	15
1.9 LESSONS LEARNED ON THE MANAGEMENT OF RESETTLEMENT IMPACTS UNDER SURP I, II AND THE THREE AFS.....	16
2 RELEVANT LEGAL, REGULATORY, AND INSTITUTIONAL FRAMEWORK....	18
2.1 SOMALILAND LEGAL AND POLICY FRAMEWORK	18
2.2 WORLD BANK ESF REQUIREMENT ON RESETTLEMENT	21
2.3 GAP ANALYSIS BETWEEN COUNTRY LEGISLATIONS AND WORLD BANK SAFEGUARDS REQUIREMENTS.....	23
3 PRINCIPLES GUIDING RESETTLEMENT	30
3.1 MITIGATION HIERARCHY TO ADDRESS RESETTLEMENT UNDER SURP II AND THE AF 30	
3.2 PRINCIPLES THAT GUIDE RESETTLEMENT UNDER SURP II AF4.....	30
4 ELIGIBILITY CRITERIA AND ENTITLEMENTS	32
4.1 GENERAL CRITERIA FOR ELIGIBLE PAPS.....	32
4.2 DISADVANTAGED/VULNERABLE GROUPS ELIGIBLE FOR SPECIAL ATTENTION/ASSISTANCE.	32
4.3 ELIGIBILITY FOR COMMUNITY ASSETS.....	33
4.4 METHOD OF ESTABLISHING OWNERSHIP	33
4.5 METHODOLOGY FOR ASSETS VALUATION AND COMPENSATION	33
4.6 VALUATION OF COMPENSATION FOR FLORICULTURAL AND TREES.....	34
4.7 ENTITLEMENT MATRIX	34
5 PROCESS FOR SCREENING, PREPARING AND APPROVING RAPS.....	39
5.1 SCREENING.....	39
5.2 DISPLACEMENT PRIOR TO PROJECT APPROVAL	39
5.3 CENSUS OF PROJECT AFFECTED PERSONS.....	40
5.4 CUT-OFF DATE.....	40
5.5 PREPARATION AND IMPLEMENTATION OF RAPS	41

6	IMPLEMENTATION SCHEDULE, COSTS AND ARRANGEMENTS.....	43
6.1	IMPLEMENTATION SCHEDULE.....	43
6.2	IMPLEMENTATION BUDGET	43
6.3	IMPLEMENTATION ARRANGEMENTS	44
7	CONSULTATION AND DISCLOSURE ARRANGEMENTS.....	46
7.1	PREPARATION AND IMPLEMENTATION PHASE	46
7.2	MONITORING AND EVALUATION PHASE	46
7.3	SUMMARY OF STAKEHOLDER ENGAGEMENT ACTIVITIES.....	46
7.4	ISSUES RAISED DURING RPF CONSULTATIONS	47
8	GRIEVANCES MECHANISMS.....	49
8.1	GENERAL PRINCIPLES	49
8.2	GRIEVANCE CHANNELS.....	49
8.3	APPEAL PROCESS	49
8.4	GRIEVANCE MANAGEMENT PROCESS	50
9	MONITORING AND EVALUATION.....	53
9.1	INTERNAL MONITORING	53
9.2	EXTERNAL MONITORING/RAP AUDIT.....	54
ANNEXES	55
	ANNEX 1: RAP OUTLINE	55
	ANNEX 2: SAMPLE OF LAND ASSET AND PHYSICAL INVENTORY CENSUS SURVEY FORM	61
	ANNEX 3: SAMPLE ASSET VALUATION SURVEY FORM.....	62
	ANNEX 4: SAMPLE SOCIO-ECONOMIC INDICATORS TO BE CONSIDERED FOR SURP_II AND THE AF IMPACT	63
	Annex 6: SUMMARY OF AF4 CONSULTATIONS CONDUCTED IN HARGEISA.....	64

LIST OF TABLES

TABLE 1: INSTITUTIONAL RESPONSIBILITY FOR AF4.....	5
TABLE 2: SUMMARY OF PROPOSED CHANGES UNDER AF4	10
TABLE 3 ACHIEVEMENTS UNDER COMPONENT 1	12
TABLE 4: ECONOMIC DISPLACEMENT FOR SURP II PROJECTS EXPERIENCED SO FAR	15
TABLE 5: COMPARATIVE GAP ANALYSIS OF SOMALILAND LAWS AND POLICIES AND WB ESS5	23
TABLE 6: MATRIX OF ENTITLEMENTS FOR DIFFERENT TYPES OF RESETTLEMENTS OR LOSS OF INCOMES OR ASSETS.	35
TABLE 7: CONTENTS OF A RAP (ESS5)	41
TABLE 8: SAMPLE TEMPLATE BUDGET FOR A RAP.....	43
TABLE 9: COMPOSITION OF PIUs, GRCs, AND THE RCs.....	44
TABLE 10: INSTITUTIONAL ROLES AND RESPONSIBILITIES	45
TABLE 11: GRIEVANCE REPORTING CHANNELS.....	49

ACRONYMS AND ABBREVIATIONS

AF2	Second Additional Financing
AF4	Fourth Additional Financing
BRA	Benadir Regional Administration
CC	Compensation Committee
CERC	Contingent Emergency Response Component
EIAs	Environmental Impact Assessments
ESCP	Environmental and Social Commitment Plan
ESF	Environment and Social Framework
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Frameworks
ESS	Environmental and Social Standards
ESS5	ESS5 on Land Acquisition, Restriction on Land Use & Involuntary Resettlement
FGS	Federal Government of Somalia
GBV	Gender Based Violence
GM	Grievance Mechanism
GRC	Grievance Redress Committee
HLP	Housing Land and Property
IDA	International Development Agency
IDPs	Internally Displacement Persons
IOM	International Organization for Migration
LMP	Labor Management Procedures
M&E	Monitoring and Evaluation
MIS	Management Information System
MoA	Ministry of Agricultural Development
MoAD	Ministry of Agricultural Development
MoECC	Ministry of Environment and Climate Change
MoF	Ministry of Finance
MoI	Ministry of Interior
MOPIED	Ministry of Planning, Investment and Economic Development
MoPWRH	Ministry of Public Works Reconstruction and Housing
MoRD	Ministry of Rural Development
MPF	Multi-Partner Fund
NBS	nature-based solutions
NFI	Non-food Items
NGOs	Non-governmental organizations
OPM	Office of the Prime Minister
PAPs	Project Affected Persons
PCIP	Precast Concrete Interlocking Paving
PCU	Project Coordination Unit
PDO	Project development objective
PFM	Public Financial Management
PIU	Project Implementation Unit
RAP	Resettlement Action Plan
RoW	Right of Way
RPF	Resettlement Policy Framework

RPs	Resettlement Action Plans
SEF	Stakeholder Engagement Framework
SEMA	Somaliland Environmental Authority
SEP	Stakeholder Engagement Plan
SMPF	Somalia Multi-Partner Fund
SURP	Somalia Urban Resilience Project
SURP-II AF	Somalia Urban Resilience Project Phase Two Additional Financing
SURP-II	Somalia Urban Resilience Project Phase Two
TPM	Third-Party Monitor
UNOPs	United Nations Office for Project Services
WASH	Water, Sanitation and Hygiene
WB	World Bank

DEFINITION OF TERMS USED IN THE REPORT

Consistent with the World Bank Environmental and Social Standard 5 (ESS5: Land Acquisition, Restriction on Land Use, and Involuntary Resettlement), the following terms shall have the following meanings:

- **Census** means a field survey carried out to identify the persons who will be affected by the project, to establish an inventory of land and assets to be affected, to determine who will be eligible for compensation and assistance, and to discourage ineligible persons, such as opportunistic settlers, from claiming benefits.
- **Compensation** means the payment in kind, cash or other assets given in exchange for the taking of land, or loss of other assets, income/profits including fixed assets thereon, in part or whole.
- **Cut-off date** is the date of commencement of the census of PAPs within the project area boundaries. This is the date on and beyond which any person whose land is occupied for project use, will not be eligible for compensation.
- **Environmental and Social Standards** - The Environmental and Social Standards (ESS) set out the requirements for Borrowers relating to the identification and assessment of environmental and social risks and impacts associated with projects supported by the Bank through Investment Project Financing. There are ten Environmental and Social Standards that establish the standards that the Borrower and the project will meet through the project life cycle.
- **Involuntary Displacement** means the involuntary taking of land resulting in direct or indirect economic and social impacts caused by:
 - a) Loss of benefits from use of such land;
 - b) Relocation or loss of shelter;
 - c) Loss of assets or access to assets; or
 - d) Loss of income sources or means of livelihood, whether or not the project affected person has moved to another location.
- **Involuntary Land Acquisition** Project-related land acquisition or restrictions on land use may cause physical displacement (relocation, loss of residential land or loss of shelter), economic displacement (loss of land, assets, or access to assets, including those that lead to loss of income sources or other means of livelihood), or both.
- **Land** refers to agricultural and/or non-agricultural land, natural resources embedded in and any structures thereon whether temporary or permanent and which may be required for the Sub-project.
- **Land acquisition** means the taking of or alienation of land, buildings, or other assets thereon for purposes of the sub-project.

- **Livelihood** refers to the full range of means that individuals, families, and communities utilize to make a living, such as wage-based income, agriculture, fishing, foraging, other natural resource-based livelihoods, petty trade, and bartering.
- **Project-Affected Household**—All members of a household, whether related or not, operating as a single economic unit, who are affected by a project.
- **Project Affected Persons (PAPs)** means persons who, for reasons of the involuntary taking of their land and other assets under the project, result in direct economic and or social adverse impacts, regardless of whether or not the said Project affected persons physically relocates. These people may have their: (i) standard of living adversely affected, whether or not the Project Affected Person must move to another location; (ii) right, title, interest in any house, land (including premises, agricultural and grazing land) or any other fixed or movable asset acquired or possessed, temporarily or permanently, adversely affected; (iii) access to productive assets adversely affected, temporarily or permanently; or (iv) business, occupation, work or place of residence or habitat adversely affected.
- **Rehabilitation Assistance** means the provision of development assistance in addition to compensation such as land preparation, credit facilities, training, or job opportunities, needed to enable project affected persons to improve their living standards, income earning capacity and production levels; or at least maintain them at pre-project levels.
- **Replacement Cost** is a method of valuation yielding compensation sufficient to replace assets, plus necessary transaction costs associated with asset replacement. Where functioning markets exist, replacement cost is the market value as established through independent and competent real estate valuation, plus transaction costs. Where functioning markets do not exist, replacement cost may be determined through alternative means, such as calculation of output value for land or productive assets, or the undepreciated value of replacement material and labour for construction of structures or other fixed assets, plus transaction costs.
- **Resettlement Assistance** means the measures to ensure that project affected persons who may require to be physically relocated are provided with assistance such as moving allowances, residential housing or rentals whichever is feasible and as required, for ease of resettlement during relocation.
- **Resettlement Action Plan (RAP)** is a resettlement instrument (document) to be prepared when development locations requiring resettlement are identified, *i.e.* where land acquisition leads to physical displacement of persons, and/or loss of shelter, and /or loss of livelihoods and/or loss, denial or restriction of access to economic resources. A RAP is prepared by the party impacting on the people and their livelihoods. A RAP contains specific requirements for resettling and compensating the affected parties before implementation of the project activities causing adverse impacts.

- **Resettlement Policy Framework (RPF)** is a framework prepared to guide resettlement action and in particular the preparation of Resettlement Action Plans during Project implementation. The RPF will be publicly disclosed in impacted areas to set out the resettlement and compensation policy, organizational arrangements, and design criteria to be applied to meet the needs of the people who may be affected by the project implementation. Resettlement Action Plans will be prepared consistent with the provisions of this RPF.
- **Subprojects** means individual investment projects which will be funded by SURP_II and the AF.
- **Stakeholders**—Any individuals, groups, organizations, and institutions potentially affected by or interested in the project.
- **Vulnerable or disadvantaged Groups** refers to those who may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project's benefits. Such an individual/group is also more likely to be excluded from/unable to participate fully in the mainstream consultation process and as such may require specific measures and/or assistance to do so. This will take into account considerations relating to age, including the elderly and minors, and including in circumstances where they may be separated from their family, the community, or other individuals upon which they depend.

EXECUTIVE SUMMARY

Introduction

Urban infrastructure and capacities in Somalia are under considerable pressure, and urban spaces are limited and contested. Many city dwellers lack adequate urban services, community and economic infrastructure, livelihood and employment opportunities, education, and appropriate, durable housing solutions. The situation is no different in Somaliland where key stakeholders consulted during project preparation (see section on stakeholder engagement below) revealed that the City of Hargeisa currently experiences a number of infrastructure related challenges. The challenges include inadequate water supply and sanitation services, poor drainage system causing frequent flooding during the rainy season and poor road network with rough and unpaved roads creating significant mobility challenges. These conditions have particularly severe consequences for pregnant women, the elderly, and individuals with health conditions who struggle with transportation on these rough roads. To partly address the gaping urban infrastructure deficit, the World Bank has been supporting the Federal Government of Somalia (FGS) since 2019 with funding from the Somalia Multi-Partner Fund (SMPF) to implement various projects including the now closed US\$ 9 million Somalia Urban Resilience Project (SURP I) targeting the improvement of urban infrastructure and strengthening of municipal governance in the cities of Mogadishu (Benadir Regional Administration, BRA) and Garowe (Puntland State).

The first Somalia Urban Resilience Project (SURP, P163857) of US\$9 million was approved in August 2018 and closed in September 2021, being the first World Bank project in Somalia providing financing for infrastructure, including secondary roads and drainage investments in Mogadishu and Garowe, directly to local governments. SURP II (P170922, the parent project) of US\$112 million was approved on December 19, 2019, and became effective on February 24, 2020. It started with four strategically important municipalities (Mogadishu, Garowe, Kismayo and Baidoa) selected from political, economic, security and vulnerability perspectives. Following the two subsidiary agreements signed in August and September 2020, the parent project has been expanded to two additional municipalities (Dhuusamareeb and Beledweyne) in two new federal member states (Galmudug State and Hirshabelle State).

The SURP II uses country Public Financial Management (PFM) systems to strengthen municipal governance and deliver infrastructure and services through subnational government systems. SURP II will aim to strengthen the resilience of cities by building the capacity of municipalities, financing investments in priority urban infrastructure or services, and providing short-term income generation opportunities particularly for the urban poor and IDPs through labour-intensive works. SURP II builds on the ongoing SURP (P163857), the Somali Urban Investment Planning Project (SUIPP) (P150374) and the SUIPP Additional Financing (P166591). SURP II has thus far benefited from three Additional Financings (AFs): i) SURP II AF1 (P178887) USD 41.5 million, ii) SURP AF2 (P179775) USD50 million, and iii) SURP II AF3 (P181512) USD50 million. Taken together, SURP-II has a total budget envelope of US\$253.5 million, with a current closing date of December 31, 2026. The project is seeking a fourth additional financing (AF4) of USD 25 million to scale up project activities in Hargeisa city, Somaliland. In its current format the SURP II project has the following three components:

- **Component 1, Urban Infrastructure and Services (USD 108 million):** supports the preparation and implementation of all eligible infrastructure, specifically this component will finance the following activities: (i) technical studies, engineering designs and bidding documents for priority investments; (ii) environment and social due diligence work; (iii) institutional assessments of implementing agencies and (iii) any other necessary analytical work. This component also finances investments in Urban Infrastructure and Services, civil works, goods, and construction supervision consultancies for investments, prioritized by the government and community members, that meet the pre-determined selection criteria.
- **Component 2, Institutional Strengthening and Analytics (US\$2 million):** Supports various technical assistance and related analytics, such as on informal settlements, climate resilient operation and maintenance of urban infrastructure, and urban governance, including solid waste management.
- **Component 3, Project Management and Capacity Building (US\$ 28.5 million):** Finances the overall project management costs, including monitoring and evaluation, as well as the capacity building of the PCU, PIUs, and relevant municipal staff.
- Components 4 (response to urban forced displacement and 5 contingent emergency response have since been closed.

The project's Fourth Additional Financing (AF4) entails several key changes including:

- a. the scale-up of component 1 by adding US\$20 million for climate resilient urban infrastructure in the additional city of Hargeisa;
- b. the scale-up of component 2 by adding US\$1 million for government-led analytical work to inform broader urban development and policy dialogue in Hargeisa and enhanced capacity building support;
- c. the scale-up of component 3 by adding US\$4 million for the federal Project Coordination Unit (PCU), Ministry of Public Works Reconstruction and Housing (MoPWRH), to establish and develop a new municipal Project Implementation Unit (PIU) in Hargeisa and supervise project implementation.
- d. The results frameworks will be revised accordingly, and the closing dates of the project will be extended from December 31, 2026, to November 30, 2028.

The AF4 builds on the existing institutional structures of SURP II to capacitate functional coordination between the state, federal, and municipal levels of governmental agencies and beneficiary communities. The proposed new activities on stabilization diagnostics will be implemented through the federal government to ensure timely implementation though still under the overarching umbrella of the SURP II institutional arrangements. The PCU will be responsible for procuring technical assistance and leading coordination for the proposed stabilization assessment. The PIU to be established in Hargeisa will support the day-to-day supervision and monitoring of these activities. The assessment results will inform the specific project and implementation modality.

Project development objective (PDO). *“to strengthen public service delivery capacity of local governments, increase access to climate-resilient urban infrastructure and to provide immediate and effective response to drought-triggered displacement in selected areas”.*

Current project status. As of June 2025, cumulative disbursement is US\$132 million, 53.8 percent of the total US\$253.5 million grant. Progress towards achievement of PDO and Overall Implementation Progress are rated Satisfactory (S). The project has maintained both ratings above Moderately Satisfactory for the past 12 months. Despite operating in a complex operating environment, the project is successfully being implemented in six strategic cities. This includes six municipal PIUs, a federal PCU providing backstopping, coordination, and quality assurance, and inter-ministerial project steering committees at state and federal levels providing strategic guidance and oversight.

Achievements to date. The project has to date reached 494,910 beneficiaries, rehabilitated 35km of roads and side drainage, employed a total of 4747 persons in skilled and unskilled labour activities, including 753 women, 933 IDPs, and 28 PWDs. Additionally, 73 individuals participated in internships and on-the-job training 86 municipal staff have been trained across six participating cities and stakeholder consultations and awareness-raising efforts have reached 13,064 individuals. Also, 98% (318) of the 322 reported grievances have been resolved. Drought response activities, including cash transfer, water and sanitation facilities, and temporary housing, land, and property (HLP) have been successfully completed in September 2024, providing life-saving assistance to more than 1 million people. 1 SURP-II has already helped better define intergovernmental functional roles and responsibilities related to urban services. With relatively strong implementation arrangements and broad geographic coverage, SURP-II has further evolved to support cities on resilient service delivery beyond city roads, such as advancing city-wide flood risk management strategies and piloting durable solutions to displacement and nature-based solutions (NBS). This demonstrates that SURP-II has succeeded in establishing a holistic platform for urban service delivery at the municipal level.

Resettlement Policy Framework (RPF)

This RPF prepared for SURP-II its three AFs (AF1, AF2 and AF3) and now updated for AF4 clarifies resettlement principles, organizational arrangements, and design criteria to be applied to subprojects or project components to be prepared during project implementation. Currently not all subprojects under AF4 are defined but once this happens and all the necessary information becomes available, the RPF will be expanded into a specific resettlement action plan (RAP) proportionate to potential risks and impacts. Project activities that will cause physical and/or economic displacement will not commence until such specific plans have been finalized and approved by the Bank.

Potential land use and anticipated resettlement impacts

The AF 4 will finance the construction of roads, walkways, drainage systems, and the installation of solar lighting, among other things. The anticipated impacts include physical and/or economic displacement, potential restrictions to access communal property, natural resources, and physical cultural heritage. Hargeisa PIU shall assess all the project effects on land and other assets before commencing project activities, prepare and implement a Resettlement Action Plan (RAP), and compensate all Project-affected

¹ The second AF added *Component 4*. The FGS engaged the International Organization for Migration (IOM) through an output agreement in Sept 2022, amended in April 2023 and completed in September 2024. The project drought response focused on key urban areas and contributing to the World Bank's overall drought response through support on housing, land, and property (HLP) and basic services (water, sanitation, and hygiene [WASH] and/or health) in Mogadishu, Baidoa, and Garowe that experienced a large inflow of IDPs triggered by the 2022/23 drought.

persons (PAPs), including those with no formal legal rights or claims to the land, such as IDPs, squatters and encroachers for improvements made on land, e.g., residential and business structures. The Hargeisa city shall also secure sufficient compensation monies in the escrow account before RAP implementation and provide evidence to the Bank and no voluntary land /wayleaves donation shall be pursued.

Relevant legal and regulatory framework

World Bank's Environmental and Social Standard 5 (ESS5) on Land Acquisition, Restrictions on Land Use and Involuntary Resettlement is the applicable. For AF4, the Bank's ESS5 will take precedence over any other applicable national, state, and municipal laws and regulations. More details are presented in Section 2.

Mitigation of resettlement

This RPF is intended to ensure that any possible adverse land-related impacts of subproject activities are addressed through appropriate mitigation measures. These risks will be minimized by:

- Avoiding and minimizing the impact of the physical and economic displacement of people to the extent possible with a well-designed compensation and relocation process;
- Compensating for losses incurred and displaced incomes and livelihoods at replacement cost , and
- Ensuring resettlement assistance or rehabilitation, as needed, to address impacts on PAPs livelihoods and their wellbeing.

More detailed principles and procedures to manage resettlement impacts are provided in Section 3.

Eligibility criteria, entitlements, and valuation of affected assets

The following category of PAPs are eligible for relevant compensation/assistance for resettlement impacts of SURP II AF4:

- Category (a): Affected persons who have formal legal rights to land or assets are those who have formal documentation under national law to prove their rights or are specifically recognized in national law as not requiring documentation.
- Category (b): Affected persons who do not have formal rights to land or assets, but who have a recognized or recognizable claim under national law.
- Category (c): Affected persons who have no recognizable legal right or claim to the land or assets they occupy, or use are eligible for assistance under ESS5. Affected persons in these groups are not eligible for compensation for land but are eligible for resettlement and livelihood assistance and compensation for assets. Those who encroach on the project area after the cut-off date (disclosed in a timely and extensive manner to all stakeholders) are not eligible for compensation/assistance under SURP-II and the AF4.

Affected disadvantaged/vulnerable groups and community assets are also eligible for compensation/assistance as specified in this RPF.

Where applicable, valuation exercise on lands and assets will be done to assess the loss to the affected persons. The basis of this valuation is derived from the ESS5 and the RPF.

More details on valuation methodology and the entitlement matrix are presented in Section 4.

Screening and preparation of Resettlement Action Plans (RAP)

The preparation of sub-project RAPs (proportionate to the nature and scale of resettlement risks and impacts) will begin with identifying the land/ areas that may result in resettlement impacts, types, and nature of potential impacts and to provide adequate measures to address them. The screening process will be led by the Hargeisa municipality and will be conducted with full participation and consultation with PAPs.

Internally displaced persons (IDPs), who fled from drought and violence, have settled on the periphery of Hargeisa city. In 2022, the Hargeisa Municipality cleared illegal structures to open roads that had been blocked by squatters without compensation. These demolitions were not conducted in anticipation of the SURP 2 project. However, if AF4 interventions are planned in areas where forced evictions occurred, relevant ESS5 requirements will be applied retroactively.

The PCU has created a comprehensive understanding of the ESF especially retroactive application to the Hargeisa team. Follow-up consultations with the Municipality, noted the Hargeisa City's commitment to avoiding forced eviction under AF4, and to paying compensation to affected persons. If the ESF requirements cannot be satisfied retroactively, the Bank will not be able to support the roads (or any other project-financed infrastructure) where forced displacement took place.

Screening of all SURP II sub-projects will be carried out jointly with local community members, especially Grievance Redress Committee (GRC) members to ascertain if there has been any occupancy in areas where civil works is to occur.

Following the screening, a census of PAPs will be conducted to determine their number and record their socio-economic profile prior to the beginning of civil works. A cut-off date will be publicly announced to indicate the beginning of the census. The preparation and implementation of subproject-specific RAPs will be carried out by the PIU. Once the draft is completed, the RAP will be submitted to the implementing agency (municipality) and the World Bank for review and approval. Individual RAPs will be translated into local language (Somali), disclosed, and implemented, following the review and clearance.

Institutional Arrangements

The AF4 will be implemented under the following institutional arrangements captured in Table 1.

Table 1: Institutional responsibility for AF4

Institution	Responsibility
Municipality of Hargeisa.	<ul style="list-style-type: none"> Overall coordination and supervision of AF4. Payment of compensation.
Project Coordination Unit (PCU) at the federal level.	<ul style="list-style-type: none"> Capacity support to the Hargeisa PIU in safeguards implementation and monitoring. Support to secure compensation for PAPs from PIU.

Institution	Responsibility
	<ul style="list-style-type: none"> Ensure the compensation monies are committed in an escrow account.
Hargeisa PIU supported by engineering and supervision consultant.	<ul style="list-style-type: none"> Stakeholder engagement in and near project sites. Supervision of all safeguard activities, including preparation and implementation of RAPs. Internal monitoring and Evaluation of resettlement and compensation activities.
Compensation Committees in Hargeisa municipality.	<ul style="list-style-type: none"> Determination of asset or income losses incurred by PAPs and their valuation.
Grievance Redress Committees (GRCs) in Hargeisa municipality.	<ul style="list-style-type: none"> Responsible for receiving and addressing project-level grievances, except for those under appeal or needing specific PIU intervention. Reporting back to PIU and community on GM performance.
Third party monitoring agent/auditor.	<ul style="list-style-type: none"> External Monitoring & Evaluation of resettlement and compensation activities including the preparation of completion audit.

Budget for Implementation

The RAP will include an itemized and adequate budget for the implementation of resettlement activities including compensation. The budgets will cover resettlement activities including compensation cost for affected assets such as land, buildings, fruit trees, and loss of access as well as loss of income. The preparation and implementation of the RAP will be financed through AF4 while funding for compensation will be provided by the) Hargeisa City. Adequate budget for stakeholder engagement, allocated from the overall budget of SURP II, will cover costs for organizing meetings, workshops, and training, hiring of staff, field visits to subproject locations, translation and printing of relevant materials and operating of GMs. The cost for environmental and social mitigation measures at construction sites (other than cost for resettlement) will be integrated into the construction cost and will be borne by the contractor.

Stakeholder Consultation, Participation and Disclosure of RPF

During preparation of AF4, the project team conducted a number of public consultation sessions to inform project planning. To start with, the PCU held its first consultation with the Mayor of Hargeisa, and the Directors for Public Works, Administration and Finance on 24th April 2024. The discussion focused on introduction of the proposed AF4, the World Bank's ESF and the related ESCP including the need to update the E&S instruments prepared under the TAF (SEF, ESMF (including GBV-SEA/SH Action Plan), RPF, and LMP). Further consultations were undertaken with directors of various departments under the Hargeisa Municipality on 3rd March 2025, where the PCU was advised on the structure of Hargeisa Local Government (HLG), its roles and responsibilities, development projects in the city funded by the local government and donors, and achievements over the last three years.

With the support of the Directors for Public Works, and Administration and Finance, the project team undertook stakeholder mapping and analysis leading to the identification of key project stakeholders in Hargeisa. They include directors of departments under the HLG, sub-district government officials and representatives from women and youth

organizations, elders, religious leaders, vulnerable community members such as Persons with disabilities (PWDs), and IDPs), community-based organizations and their umbrella structures. The preliminary stakeholder consultations were primarily structured around key thematic areas, including stakeholder engagement, grievance management, gender, GBV-SEA/SH, involuntary resettlement, and vulnerable groups. The PIU informed the stakeholders about the project scope, target beneficiaries, timelines, benefits and opportunities, responsibilities, potential project risks and impacts and mitigation measures, institutional/implementation arrangements, and potential investments. A total of 141 stakeholders (106 males and 35 females) were engaged. More details on the consultations are provided in the updated SEF prepared for SURPII AF4. Also, see Annex 6 for more details.

This RPF was similarly disclosed in-country on the external website of the Ministry of Public Works and on the World Bank's website. The present version of the RPF updated in April-June 2025, presents details on activities to be funded under AF4, issues raised during consultations, and lessons learned from SURP 1, II and the three AFs (AF1, 2 and 3).

Grievance Mechanism (GM)

The SURP II AF 4 will retain the established grievance mechanism that addresses concerns of stakeholders promptly and effectively and in a transparent manner. It should remain culturally appropriate and readily accessible to all project-affected parties, confidential/sensitive to Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) cases, at no cost and without retribution. The mechanism will not prevent access to judicial or administrative remedies. Grievance Redress Committee (GRCs) will be established in Hargeisa to address grievances of the community and individuals.

Monitoring and Evaluation

During RAP implementation, both internal and external resettlement monitoring and evaluation (M&E) will be carried out to ensure all PAPs are adequately consulted and compensated. The internal resettlement monitoring will be carried out by the M&E Specialist in the PIU. For external resettlement M&E, the Third-Party contracted by the Bank will also support the M&E activities. A monitoring plan will be developed to assess whether the goals of the compensation plan are being met and the results captured in the Management Information System (MIS) to inform the E&S quarterly monitoring reports. The following parameters and verifiable indicators will be used to measure compensation plans performance. Where applicable, these parameters/indicators will be disaggregated to measure the relevance to women and other vulnerable groups:

- Collection and storage of census data into a database for comparative analysis.
- Number of PAPs physically or economically displaced by each sub-project.
- Number of impacted residents employed by the project.
- Timing of compensation in relation to commencement of physical works.
- Compensation amount paid to each PAP.
- Number of people raising grievances and reached resolutions.
- All relevant items in the entitlement matrix will be monitored.
- Consultations held.

The M&E approach adopted under the project has worked well. With the exception of the situation in Baidoa, no significant RAP-related aspects have been registered in the other five cities.

1 INTRODUCTION

1.1 BACKGROUND

The Federal Republic of Somalia is implementing the Somalia Urban Resilience Project (SURP) Phase II in six municipalities across Somalia. The project, supported by the World Bank (WB), is a USD 278.5 million project funded through grants from the Somalia Multi Partner (SMPF) and the International Development Agency (IDA). SURP II aims at strengthening urban resilience by: (i) providing capacity building support to municipalities and strengthening government systems at the sub-national level by channeling funds on-budget; (ii) financing prioritized urban infrastructure investments in cities; (iii) creating short-term income generation opportunities for vulnerable groups, such as women, the urban poor, internally displaced persons (IDPs) and returnees; and (iv) strengthening institutions for urban development at the municipal level.

The initial phase (SURP-I) was a USD 112 million project (approved on December 19, 2019, and became effective on February 24, 2020) was executed in the municipalities of Mogadishu (Banadir Regional Administration), Garowe (Puntland State), Kismayo (Jubaland State), and Baidoa (South-West State). With successful implementation the project received two Additional Financings (AFs): i) SURP II AF1 (P178887) USD 41.5 million, ii) SURP AF2 (P179775) USD50 million, and iii) SURP II AF3 (P181512) USD50 million. With the two AFs and growing success, the project was expanded to include two new cities, Beledweyne in Hirshabeele State, and Dhuusamareeb in Galmudug State through a third Additional Financing (AF3). The third AF (P181512) of US\$40 million from IDA and US\$10 million from SMPF was declared effective on August 19, 2024. Taken together, SURP-II will have a total budget envelope of US\$253.5 million, with a current closing date of December 31, 2026.

SURP-II (and its AFs) has been given a Somali name, and it is now referred to as the Nagaad Project meaning “prosperous settlement” which better conveys the Project’s objective to the stakeholders. The Project is now seeking a fourth Additional Financing (AF4) of USD 25 million to scale up project activities in the City of Hargeisa in Somaliland. This Resettlement Framework (RF) has been updated for SURP-II AF4.

1.2 PROJECT DEVELOPMENT OBJECTIVE:

Nagaad’s project development objective is to strengthen public service delivery capacity of local governments, increase access to climate-resilient urban infrastructure and services,

and to provide immediate and effective response to an eligible crisis or emergency in selected areas.

1.3 PROJECT COMPONENTS AND PROGRESS

In its current format the SURP II project has the following three components:

- **Component 1, Urban Infrastructure and Services (USD 108 million):** supports the preparation and implementation of all eligible infrastructure, specifically this component will finance the following activities: (i) technical studies, engineering designs and bidding documents for priority investments; (ii) environment and social due diligence work; (iii) institutional assessments of implementing agencies and (iii) any other necessary analytical work. This component also finances investments in Urban Infrastructure and Services, civil works, goods and construction supervision consultancies for investments, prioritized by the government and community members, that meet the pre-determined selection criteria
- **Component 2, Institutional Strengthening and Analytics (US\$2 million):** Supports various technical assistance and related analytics, such as on informal settlements, climate resilient operation and maintenance of urban infrastructure, and urban governance, including solid waste management.
- **Component 3, Project Management and Capacity Building (US\$ 28.5 million):** Finances the overall project management costs, including monitoring and evaluation, as well as the capacity building of the PCU, PIUs, and relevant municipal staff.

1.4 ACTIVITIES TO BE FINANCED UNDER AF4

While the PDO will remain unchanged, AF4 targets to support improving resilient urban infrastructure investments such as roads and drainage, given its high exposure to flood risks in Hargeisa metro area, the second largest city after Mogadishu. This will complement and leverage completed and ongoing preparatory activities, such as detailed engineering design for a priority bridge and preliminary design for a priority road (8km). It will also leverage the designs for the PIU office and material testing laboratories supported through the project in other cities. Specifically, AF4 will scale up interventions in some of the project components as described below.

- a. **Component 1: Urban Infrastructure and Services (US\$175 million).** The allocation will be increased from US\$155 million to US\$175 million, scaling up resilient urban infrastructure and services to include the additional city of Hargeisa. To date, US\$122 million (78%) have been disbursed and committed under this component.²The inclusion of Hargeisa will be endorsed by the federal inter-ministerial Project Steering Committee by appraisal. The inclusion of Hargeisa as the second largest urbanized after Mogadishu and the capital of Somaliland, is essential for the project to support investments in climate-resilient urban infrastructure and services, to strengthen local government's service delivery capacity. The project will support similar investments covered by the project, such as roads and pedestrian walkways, solar streetlights, bridges, culverts, roadside drainage,

² Under Component 1, US\$122million has been committed or disbursed, or 78%.

and a PIU office and material testing laboratory³, in line with international standards⁴. All investments will have climate-informed engineering designs that account for localized climate projections. It will also prioritize nature-based solutions (NBS), such as native grasses and tree planting alongside roads, which will mitigate drought by reducing the urban heat island effect. The proposed AF4 investments will be finalized using multi-criteria analysis in consultation with communities and stakeholders.⁵

- b. **Component 2: Institutional Strengthening and Analytics (US\$4 million).** The budget allocation will increase from US\$3 million to US\$4 million, to provide additional technical assistance to address critical issues related to urban development in Hargeisa, likely to focus on solid waste management and flood risk management based on initial consultations. This will be further clarified during appraisal..
- c. **Component 3: Project Management and Capacity Building (US\$34.5 million).** To cover the government's increased project management costs due to the addition of Hargeisa and the extended project closing date, the budget allocation from the component will increase from US\$30.5 million to US\$34.5 million. It will also increase capacity-building support focused on the municipal level, but now also including state and federal MoPWRH technical staff, with a focus on strengthening operations and maintenance and strategic supervision.

A summary of the proposed changes under AF4 is presented in **Table 2** below.

Table 2: Summary of Proposed Changes under AF4

Activities	Proposed Changes
Component 1: Urban Infrastructure and Services	Add US\$20 million to scale-up infrastructure investments in Hargeisa. This includes feasibility studies, investments, and civil works supervision.
Component 2: Institutional Strengthening and Analytics	Add US\$1 million to scale-up technical assistance to support priority urban analytics for Hargeisa.
Component 3: Project Management and Capacity building	Add US\$4 million to support the establishment of a new PIU in Hargeisa, continue PCU support through the extended project end date, and include FMS MPWRH in capacity building activities.
Changes to the Results Framework	End Targets to of selected indicators will be changed to reflect the scaled-up activities. Revision of selected intermediate indicators and adding new indicators to reflect the refined project approach.

3 Completed 35.6Km of asphalt concrete roads with roadside drains, 3 box culverts and one bridge in Baidoa, Garowe, Kismayo, and Mogadishu. Completed 1.44km stand-alone drainage in Mogadishu and Kismayo, desilted 4 catchment ponds and cleaned 2.4km trunk drainage in Mogadishu. Currently, the construction of 34.3Km of asphalt concrete roads is ongoing, while contracts for 15.6Km will be signed by April '26 and designs for 11Km will be ready in May '25. A total of 55km of priority trunk drainage are planned for Mogadishu, Kismayo, Baidoa, and Garowe, while 24.3Km will be implemented with available funding.

⁴ Any flood risk management infrastructure (trunk drainage, roadside drainage, detention ponds) and the bridges will be designed using international standards already in use by the project and based on climate change adjusted 25-year return period.

⁵ As done for all project cities, Hargeisa will complete urban infrastructure and institutional needs assessments to identify the infrastructure needs of residents and assess the feasibility of constructing priority infrastructure through a multi-criteria analysis based on available funding. Under SUIPP, a baseline urban infrastructure needs assessment was completed for Hargeisa (2016) for which the project will update.

Activities	Proposed Changes
Changes to closing date of the project	Extend the closing date of the project from December 31, 2026, to December 31, 2028.
Add city level implementing agency for Hargeisa	A new PIU established in Hargeisa

1.5 IMPLEMENTATION ARRANGEMENTS

SURP II is directed by a Steering Committee chaired by the national Ministry of Public Works Reconstruction and Housing (MPWR&H) with representation of the Office of the Prime Minister (OPM), Ministry of Finance (MoF), Ministry of Planning, Investment and Economic Development (MoPIED) and representatives of participating FMSs and BRA. The project is managed by municipal-level Project Implementation Units (PIU) in the six municipalities with further coordination support from state-level inter-ministerial committees.

Under AF4, the implementation arrangements will be adjusted to reflect a new PIU in Hargeisa. The PIU will be established in Hargeisa and will be responsible for procuring investments and for day-to-day supervision and monitoring. The PIU shall comprise of at least a project coordinator and a project engineer, along with specialists in the following areas: environmental and social risks management, monitoring and evaluation, procurement, and finance. In addition, the PIUs also have community engagement officers (CEOs), one of whom must be a female. The federal PCU will provide backstopping support. The PCU consist of a project coordinator, project engineer, and specialists in the following areas: procurement, gender/gender-based violence (GBV), financial management, environmental and social. An inter-ministerial steering committee for Somaliland will be established to provide strategic oversight and guidance. The Engineering and Supervising Consultant (ESC) hired by the Hargeisa Municipality will support on engineering and supervision aspects while the Third-Party Monitor (TPM) engaged by the World Bank will provide quality assurance of the supervision.

1.6 IMPLEMENTATION STATUS AND ACHIEVEMENTS TO DATE

As of June 2025, cumulative disbursement is US\$132 million, 53.8 percent. Progress towards achievement of PDO and Overall Implementation Progress is rated Satisfactory (S). The project has maintained both ratings above Moderately Satisfactory for the past 12 months. Despite operating in a complex operating environment, the project is being implemented in six strategic cities. This includes six municipal PIUs, a federal PCU providing backstopping, coordination, and quality assurance, and inter-ministerial project steering committees at state and federal levels providing strategic guidance and oversight.

The project has to date reached 494,910 beneficiaries, rehabilitated 35km of roads and side drainage, employed a total of 4747 persons in skilled and unskilled labour activities, including 753 women, 933 IDPs, and 28 PWDs. Additionally, 73 individuals participated in internships and on-the-job training 86 municipal staff have been trained across six participating cities and stakeholder consultations and awareness-raising efforts have reached 13,064 individuals. Also, 98% (318) of the 322 reported grievances have been

resolved. Drought response activities, including cash transfer, water and sanitation facilities, and temporary housing, land, and property (HLP) have been successfully completed in September 2024, providing life-saving assistance to more than 1 million people. 6 SURP-II has already helped define intergovernmental functional roles and responsibilities related to urban services. With relatively strong implementation arrangements and broad geographic coverage, SURP-II has further evolved to support cities on resilient service delivery beyond city roads, such as advancing city-wide flood risk management strategies and piloting durable solutions to displacement and nature-based solutions (NBS). This demonstrates that SURP-II has succeeded in establishing a holistic platform for urban service delivery at the municipal level. **Table 3** provides a summary of the key achievements under component 1.

Table 3 Achievements under Component 1

Project Activity	Description & Status
Baidoa Municipality	
Package 2 Roads	<ul style="list-style-type: none"> It covers 10.7 km of roads, including 30KA Road (3.2 km), Hanano 2 Road (3.9 km), and Hospital Road 1B (2.7 km). 99% progress with road marking remains from the snag list.
Package 3B	<ul style="list-style-type: none"> Includes construction of 3 urban roads: Sharif Gamey Road (1.7 km), Mursal Road (1.3 km), and Unaye Road (2.8 km). As of 17 April 2025, physical progress is 9.66% vs 3.85% planned, with 19.30% time elapsed.
Package 3A	<ul style="list-style-type: none"> Covers construction of Baidoa Main Road (2.6 km dual carriageway). Civil works commenced in April 2025. Contract suspend on June 2, 2025, due to non-payment of compensation prior to civil works commencement.
Feasibility Study & DED	Gravel Ring Road and Citywide Drainage. Progress: Feasibility studies initiated; inception report expected from UNOPS.
Kismayo	
Package 2A – Kismayo CBD Roads (4.75 km)	<ul style="list-style-type: none"> Includes construction of Afmadow Road (1.5 km), Halgan Road (2.65 km), and Golol Road (0.57 km). Physical progress stands at 80%, against 85% planned, with 91% time elapsed.
Package 2B – Kismayo CBD Roads (4.5 km)	<ul style="list-style-type: none"> Comprises Jubaland Road (4 km) and Fiyaad Road (0.5 km). Progress: 21.4% achieved vs. 79.6% planned, with 79% of time elapsed.
Package 3 – Construction of 5.1km Kismayo Outer Roads	<ul style="list-style-type: none"> Includes Road 2B 1.71km, Road 4B 1.3km, Road 10 2.1km. Contracts signed in Feb 2025 and contractor under mobilization currently.
Citywide Drainage Feasibility & Engineering Designs	<ul style="list-style-type: none"> Contracts signed for Feasibility Studies, Preliminary & Detailed Designs, and Bidding Documents for Citywide Drainage. Inception report received in April 2025.
Package 1 Roads – Defects Liability Period (DLP)	<ul style="list-style-type: none"> The DLP ended in February 2025. A final assessment was conducted between 23–25 February 2025, and the contractor is currently addressing items in the snag list.
Mogadishu	

⁶ The second AF added *Component 4*. The FGS engaged the International Organization for Migration (IOM) through an output agreement in Sept 2022, amended in April 2023 and completed in September 2024. The project drought response focused on key urban areas and contributing to the World Bank's overall drought response through support on housing, land, and property (HLP) and basic services (water, sanitation, and hygiene [WASH] and/or health) in Mogadishu, Baidoa, and Garowe that experienced a large inflow of IDPs triggered by the 2022/23 drought.

Project Activity	Description & Status
Package 1 – Deynile Road	<ul style="list-style-type: none"> A 2 km dual carriageway is located in Daynile District. Works scheduled to commence in June May 2025, once compensation is paid.
Package 2 – Madina Hospital & Kalkaal Roads (4 km)	<ul style="list-style-type: none"> Includes Madina Hospital Road (1 km) in Wadajir and Kalkaal Road (3 km) in Kahda District. Works scheduled to commence in June 2025, once compensation is paid.
Package 3 – Urban Roads (3.94 km)	<ul style="list-style-type: none"> Roads include Saddexda Geed (Shangani), Nasiib Buundo (Shibis), and Via Roma, Via Landa & Marine to District HQ Roads (Hamarweyne). Works scheduled to commence in June May 2025, once compensation is paid.
Package 4 – Keysaney Hospital Road (2.89 km)	<ul style="list-style-type: none"> Located in Kaaran District. Works scheduled to commence in June May 2025, once compensation is paid.
City Old Drainage – Assessment & Cleaning (5 km)	<ul style="list-style-type: none"> Ongoing works on 5 km of existing drainage system. Progress at 90%, with completion expected by 15 September 2025.
BRA Office Construction	<ul style="list-style-type: none"> Construction of the new BRA office is in progress. Current physical progress is at 50%, with completion targeted by 15 August 2025.
Trunk Drainage – Feasibility & Design	<ul style="list-style-type: none"> Feasibility study completed. DEDs (Detailed Engineering Designs) are at the final stage.
Priority Drainage Lines (10 km)	<ul style="list-style-type: none"> Procurement for construction to begin upon finalization of DEDs.
Dhuusamareeb Municipality	
Urban Roads (24km) FS, DEDs & Public Park	<ul style="list-style-type: none"> Feasibility studies and detailed engineering designs (DEDs) completed for 24 km of roads and one public park.
Package 2 Roads (3.3 km)	<ul style="list-style-type: none"> Covers rehabilitation of 3.3 km of the main road in Dhuusamareeb town. Mobilization completed & supervision team onboarded.
Package 1 Roads (4.9 km)	<ul style="list-style-type: none"> Construction of Dhuusamareeb Main Road (Road #1), totaling 4.9 km. Currently at the procurement stage.
PIU Office & Material Testing Laboratory	<ul style="list-style-type: none"> Construction of the PIU office and Material Testing Laboratory was fully completed 100% in December 2024. Additional works proposed separately. Lab equipment has been procured and delivered.
Beledweyne	
Urban Roads (23.59 km), FS & DEDs, Bridges	<ul style="list-style-type: none"> Feasibility studies (FS) and detailed engineering designs (DEDs) completed for 23.59 km across 8 roads and existing bridge assessments. FS and DEDs for 2 new bridges and connector roads are ongoing.
PIU Office & Material Testing Laboratory	<ul style="list-style-type: none"> Construction progress is at 90% vs. planned 83%, expected to be completed ahead of the 24 August 2025 end date. Procurement of lab equipment is underway and is to be delivered in June 2025.
Package 1B – Irida Aamin Road (3 km)	<ul style="list-style-type: none"> RAP review ongoing
Package 2 – Road #1 Inner Ring Road (3.25 km)	<ul style="list-style-type: none"> RAP review ongoing
Package 3 – Sheikh Hassan Barsane Road (3 km)	<ul style="list-style-type: none"> RAP review ongoing
Garowe Municipality	

Project Activity	Description & Status
Package 2: Gambool Bridge & Roads	<ul style="list-style-type: none"> Includes construction of Gambool Bridge (145m) and Gambool Road (1.22 km), plus additional works on East Africa University Road (580m) and Main City Road Expansion (500m), completed 100% by 5 February 2025.
Citywide Stormwater Drainage	<ul style="list-style-type: none"> Feasibility study and DED for Lot 2, Part 1 completed. ✂ Advertised in February 2025 and contract awarded on 25 April 2025. There are remaining lots, including two new segments, to be finalized by August 2025.
PIU Office Building	<ul style="list-style-type: none"> Structural assessment and designs completed. Procurement initiated with invitation to bids on 26 April 2025.
Urban Road Designs (~20 km)	<ul style="list-style-type: none"> Final designs for approximately 20 km of roads in Garowe have been completed.

Under Component 2, the TA on infrastructure operations and maintenance, informal settlement, and urban governance and services have been completed.

Under Component 3, the PCU and the Kismayo, Beledweyne, Dhuusamareeb, Garowe and Baidoa PIUs are fully staffed. Mogadishu PIU is in the process of recruiting recently vacated E&S specialist positions. Further, the PCU is recruiting a Communications Specialist.

Under Component 4, the following milestones:

- 1150 climate resilient houses and toilets constructed in Baidoa and 1000 in Garowe. Relocation of beneficiaries to their new homes and issuance of title deeds ongoing.
- Land tenure secured for 79,192 individuals in Mogadishu.
- 6 solar powered boreholes constructed in Mogadishu and 4 in Baidoa. Operations and maintenance water user committees have been set-up and trained. 15,000 individuals in Mogadishu and 6,000 individuals in Baidoa provided with clean and safe water.
- 750 water distribution points constructed in Garowe supplying clean and safe water to 5,000 individuals.
- 434,484 individuals provided with health and nutrition services.
- 1,500 trees planted in Baidoa.
- 75 solar streetlights installed in Baidoa and 50 in Garowe.
- A total of 72, 692 workdays generated through cash for work activities.
- 45,119 households have benefitted from multipurpose cash assistance.
- On Nature-Based Solutions, a total of 3250 trees have been planted.

1.7 ENVIRONMENTAL AND SOCIAL BENEFITS

The SURP II AF4 is expected to bring about positive environmental impacts, such as: (i) improved air quality due to reduced traffic congestion; (ii) improved pedestrian safety with improved road surface; and (iii) reduced road flooding and reduced roadside erosion through drainage improvement. The project will also have positive social impacts, for example: (i) improved community accessibility to schools, health care centers, and other social amenities and livelihood activities; (ii) improved security and safety through improved walkways and street lights; (iii) employment opportunities for the community

through construction and maintenance of the municipal infrastructure; (iv) positive economic impacts on livelihood and local businesses; and (v) transfer of appropriate skills in urban infrastructure development and maintenance, benefiting both field workers and officers at the municipalities.

1.8 LAND USE AND ANTICIPATED RESETTLEMENT IMPACTS

Because of the limited scale of individual subprojects and their moderate nature of rehabilitation/upgrading work on the existing Right of Way (ROW) of public roads, the need for land acquisition in SURP II AF 4 is not anticipated. However, due to the project's urban environment it is likely that subprojects will cause the following types of potential resettlement impacts (mostly minor, temporary and economic displacement with very limited cases of physical displacement⁷):

- Temporary economic loss of businesses or vendors during the construction, who operate along the project roads, including vulnerable groups.
- Damages to assets and structures such as walls, community latrines and septic tanks and graves that exist in the ROW.
- Loss of vegetation and trees along the road alignment.
- Access restrictions and temporarily impeded pedestrian access.
- Physical displacement of informal dwellers (including IDPs and returnees) who reside in the ROW of the roads.
- Loss of land and structures.

Captured in **Table 4** below are the resettlement impacts that have been identified in the RAPs prepared for the six cities, which will help understand the scale and nature of the economic and physical displacement to be anticipated under the AF 4. *(More details are provided in the individual RAPs).*

Table 4: Economic Displacement for SURP II Projects Experienced So Far

Municipality	Physical displacement	Economic displacement	Typology of impacts
Mogadishu	0	1,255 households	<ul style="list-style-type: none"> • 528 street vendors • 146 kiosks • 581 shops
Dhuusamareeb	0	41 households	<ul style="list-style-type: none"> • 8 structures (2 public properties) • 41 loss of income
Baidoa	<ul style="list-style-type: none"> • Verification ongoing 	<ul style="list-style-type: none"> • Verification ongoing 	<ul style="list-style-type: none"> • Verification ongoing
Kismayo	0	87 households	<ul style="list-style-type: none"> • 43 structures • 13 loss of income
Garowe	0	38 households	<ul style="list-style-type: none"> • 6 structures+3 • 26 loss of income
Beledweyne	0	82 households	<ul style="list-style-type: none"> • 82 structures • 53 loss of income

⁷ No physical displacement occurred under SURP I.

1.9 LESSONS LEARNED ON THE MANAGEMENT OF RESETTLEMENT IMPACTS UNDER SURP I, II AND THE THREE AFs

Key lessons learned on the management of resettlement impacts under SURP I, II and – the three AFs include the following, which will be taken into consideration for the implementation of the project:

- **Avoidance of physical displacement:** The permanent displacement of residential structures should be avoided at all costs. Compensating for these has been challenging due to limited spaces for relocations in urban areas. In a candidate subproject under SURP I where a relocation site was identified, it was in the periphery areas of the city that were not attractive to the displaced due to security concerns and limitations on livelihood restoration. Consequently, the subproject was cancelled. Given the general lack of clarity on land ownership, the issuance of land title would also remain a challenge.
- **Livelihood impact on prolonged construction:** Delays in construction that can result in changes to compensation amounts should be avoided through regular review of the contractor work-plan. In the event of any delays, the municipality should be prepared to give additional compensation as provided for in this RPF, and the RAP should be updated in a timely manner.
- **Duration between RAP preparation and implementation:** Due to funding limitations, there have been instances where the gap between the disclosure of the RAP and the commencement of civil works exceeds three years. Throughout this waiting period, municipalities should utilize various channels to keep the public informed, with updates at least every six months regarding the expected investments. Additionally, an assessment should be conducted to evaluate any changes that may have occurred during this waiting period. It is also recommended to minimize the gap between RAP disclosure and the start of civil works.
- **RAP Preparation and Implementation.** Municipal Disclosure and Coordination During Project Screening: The recent forced eviction incident in Baidoa has highlighted the urgent need for better coordination and transparency in project planning and screening. It emphasizes how crucial it is for municipalities to disclose any current or planned development projects—like infrastructure investments, changes in land use, or urban renewal—within or adjacent to the proposed project area. To avoid unintended consequences and protect communities, the screening team needs to actively seek this information during the subproject selection and environmental and social screening phases. The goal is to pinpoint any potential overlaps or conflicts that could impact land availability, community settlements, or the overall environmental and social landscape. As part of this process:

- Municipalities are required to formally notify the Project Coordination Unit (PCU) in writing of any planned or ongoing land acquisition or structure demolition activities near or within the project footprint.
- These activities must not proceed without pre-clearance from the PCU, which will assess potential environmental and social risks and determine the need for further action or mitigation.
- **Client buy-in on ESS5:** Lack of or minimal client buy-in during the early phases of the project is an obstacle to be dealt with through awareness raising of the Bank's ESS5. Ensuring that the consequences of non-compliance are understood by the decision makers is key. In Mogadishu, understanding of Bank's policies by the mayor led to his leadership in convincing other government officials to comply with the ESS5. Sensitized municipality officials played a key role in ensuring no evictions occur under the project.
- **Securing funding for RAP compensation:** Securing funds that may be required for compensation, immediately after the RAP is approved, and depositing this money in a designated bank account will minimize the likelihood of delays in compensation payment. This may be critical in the case of change in leadership where previously made financial commitments may not be honoured.
- **Better contractor management on resettlement:** Prior to handing-over of roads/site to the contractor, the safeguards specialist from the PIU, construction supervision firm and the contractor should jointly ensure the RAP has been implemented and attach an indication of this to the right to proceed document provided to the contractor. This will minimize the risk of overlooking any changes or pending issues before the start of civil works. This will also avoid unnecessary contractual liability issues down the road (compensation request by the contractor for the suspension of work).
- **Involvement of affected communities in the verification process:** The active participation of the GRC members during the verification process significantly reduces the time taken to compensate and forestalls compensation related grievances.
- **Voluntary land donation:** Voluntary land donation should not be allowed where there is no option for refusal.
- **Compensation Committee:** Process of valuation and calculation of compensation should be well documented to ensure consistency and transparency.
- **Maintaining records:** Maintaining records of consultations, PAP database, proof of cut-off date notice, agreements with PAPs, proof of disbursement of compensation and other entitlements, pre and post impacts photographs would be useful for dispute resolution, RAP Audit and sharing and learning. Procedure of establishing ownership/proof used.

- **Managing security risks:** Security risks during RAP preparation and implementation should be carefully managed.
- **Awareness of consequences of encroachment after cut-off date:** In Kismayo, under SURP-II, there have been several instances of property construction several months after the cut-off date and demolition of the same leading to various grievances. Some of the encroachers indicated they knew what encroachment after the cut-off date would entail but thought the risk was worth it given the opportunities presented by the new roads. The timely and extensive awareness raising by government on the cut-off date as well as the consequences of encroachment after the cut-off date could be done more often as part of the other ongoing campaigns such as on road safety. The project will include additional measures such as putting up signages prohibiting encroachment after the cut-off date and intensifying engagement and oversight through community engagement officers and Grievance Committees.

2 RELEVANT LEGAL, REGULATORY, AND INSTITUTIONAL FRAMEWORK

2.1 SOMALILAND LEGAL AND POLICY FRAMEWORK

Somaliland national legislation is drawn from a variety of different historical legal regimes. Currently, many new laws or revisions are in progress. While legislations have been developed around land, the country only has fledgling laws in place that do not yet define land rights.

The Constitution of Somaliland

The key legal instrument for the management of human rights and management of properties in Somaliland is the Constitution, especially Article 8 (“Equity of Citizen”), Article 12 (“Public Assets, Natural Resources and Indigenous Production”), Article 15 (“Education, Youth and Sports”), and Article 31 (“The Right to Own Private Property”).

Article 8: Equality of Citizens

- All citizens of Somaliland shall enjoy equal rights and obligations before the law, and shall not be accorded precedence on grounds of color, clan, birth, language, gender, property, status, opinion etc.
- Precedence and discrimination on grounds of ethnicity, clan affiliation, birth and residence is prohibited; and at the same time programmes aimed at eradicating long-lasting bad practices shall be a national obligation.
- Save for the political rights reserved for citizens, foreigners lawfully resident in Somaliland shall enjoy rights and obligations before the law equal to those enjoyed by citizens.

Article 12 (“Public Assets, Natural Resources and Indigenous Production) exhorts that:

- The land is public property commonly owned by the nation, and the state is responsible for it.
- The care and safeguarding of property, endowments and public assets is the responsibility of the state and all citizens; and shall be determined by law.
- The Government shall have the power to own and possess movable and immovable property; and to purchase, sell, rent, lease, exchange on equivalent value, or otherwise expend that property in any way which is in accordance with the law.
- The national government is responsible for the natural resources of the country and shall take all possible steps to explore and exploit all these resources which are available in the nation’s land or sea. The protection and the best means of the exploitation of these natural resources shall be determined by law.
- Where it is necessary to transfer the ownership or the benefits of a public asset, the transfer shall be effected in accordance with the law.

Article 15: Education, Youth and Sports

- The state shall pay particular attention to the advancement, extension and dissemination of knowledge and education as it recognizes that education is the most appropriate investment that can play a major role in political, economic and social development.
- Education is in the public interest and is rooted in the experience and the special environment of the Somaliland society.

Article 28: Right to Sue and Defend

- Every person shall have the right to institute proceedings in a competent court in accordance with the law.
- Every person shall have the right to defend himself in court.
- The state shall provide free legal defense in matters which are determined by the law, and court fees may be waived for the indigent.

Article 31 on The Right to Own Private Property stipulates that:

- Every person shall have the right to own private property, provided that it is acquired lawfully.
- Private property acquired lawfully shall not be expropriated except for reasons of public interest and provided that proper compensation is paid.
- The law shall determine matters that are within public interest, which may bring about the expropriation of private property.

Rural land in Somaliland falls into two categories: agricultural land and pastoral land. Agricultural land consists of land that is rain-fed and land set aside for irrigation while pastoral land, sometimes also called range land is by implication all land that is not urban, agricultural or attached to mineral rights. While this classification is not explicitly laid out, Article 17 of the Agricultural Land Law of 1999 stipulates that no rain-fed agricultural land shall be taken out of the common range lands and Article 8 (1) of the Urban Land Law of 2001 stipulates that the Local authorities may not grant any land that is set aside for mining or agriculture, that lies along the coast or is public land. The

Ministry of Agricultural Development (MoAD) manages all agricultural land while the Ministry of Rural Development & Environment (MoRD), oversees the management of pastoral land in conjunction with the Ministries of Water, Mineral Resources and the Ministry of Livestock. The Ministry of Rural Development and Environment is also tasked by virtue of the 1999 law with the conservation of the environment. In detail the Land and Agricultural laws stipulate the following:

Urban Land Management Law No: 17/2001 as amended in 2008. Urban Land Law vests the power to grant title within urban areas in Local Authorities. This authority is exercised by the Executive Committees of the various District Councils or their Land Subcommittee along with other duties such as land allocation, planning and development of land, land tenure, disputes, and appropriation of land for public use. Regarding the settlement of land disputes, in particular, Article 28 of the 2001 law had initially established a quasijudicial committee chaired by a District Judge which deals with disputes about urban land, appeals to decisions of the committee lay with the Regional Court. Following Presidential Decree 363/2008 which came into force on 09/09/2008, this position was changed and now disputes are heard by technical committees –the Administrative Urban Land Disputes Committees. An example of the casual manner in which this formal land dispute resolution mechanism interacts with traditional systems is to be drawn from the observation that the committees often refer disputants back to elders. As with all other administrative bodies, appeals from this committee lie to the Supreme Court. In retrospect, this development may have made it harder for disputants to sufficiently resolve land disputes using the legal system as the latter mechanism is bound to be more cumbersome and expensive than before.

The Somaliland Agricultural Land Ownership Law (No. 08/99). Article 4 provides that already owned lands shall be registered at the Ministry of Agriculture within one year from the effective date of this Act, with maximum agricultural land to be given as private property being 8 hectares of rainfed land, and 4 hectares of irrigated land. However, this provision doesn't apply to government/ company properties (Article 5). Further, Article 8 speaks to ownership for the public interest, establishing that any cultivated land may be confiscated – reasons for which are listed in Article 12 - and the confiscation shall be compensated. Rights of the landowner are provided for in Article 10, with responsibilities of said owner being (i) improving the land by increasing productivity, (ii) paying for employees and guaranteeing worthy work as per the Labor Law, and (iii) paying required land taxes (Article 11).

Regions and Districts Law (Law No: 23/2002) As Amended 2007. The main law governing Somaliland local government is the Regions & District (Law No. 23/2002) Amended 2007. Besides addressing issues related to security, law and order, the district councils are also responsible for the allocation or planning of new land schemes in their areas of jurisdiction (article 20 and 34). Article 24 gives the mandate to propose, in accordance with the law, the appropriation of privately-owned vacant land for public interest reasons, which means that the district authorities have powers to expropriate private owned vacant lands for purposes of public interest. The ministry of interior has wide authority within the act to operationalize the relevant sections relating to the district council powers over land allocation and distribution within their respective jurisdictions.

Therefore, both Law No. 17 and Law No. 23 of Urban Land Law and Regional and District Law mandate the minister of interior to issue regulations to implement these acts. In Hargeisa, the capital city, the municipality has a land department which oversees land regulation and allocation. There is a second section which is in charge of ownership transfers and building permit registration. Meanwhile, a third, independent department is responsible for issuing title deeds. The building permit is a compulsory document that is evidence of an owner's permission to develop and construct a building, but it is not compulsory to register the title to the building or land. All private land transactions are subject to notification and registration with a public notary. Registration is manual and the link between the registration office and the mapping section is very weak. The

mapping section employs two staff to develop basic maps of Hargeisa; however, very little information appears on the maps. In the rural hinterland, the institutional setup is not clear.

The Somaliland Penal Code is divided into three “books”, pertaining to (i) Offences in General – covering general principles such as non-retroactive application of law, jurisdiction, offences committed abroad and extradition; (ii) Crimes – encapsulating crimes against personality of the state, against public administration, against the course of justice, against public order, against public safety, against national economy, industry and commerce, against property, and against the person and safety of individuals, to mention but a few, and (iii) Contraventions.

Institutional Capacity for Environmental and Social Management.

The Government of Somaliland has a Ministry of Environment and Climate Change (MoECC), which bears the lead responsibility for developing the Climate Change sector, protecting, conserving, and managing the environment through sustainable development aimed at eradicating poverty, improving living standards, and ensuring that a protected and conserved environment is available. Further, the MoECC is responsible for carrying out environmental impact assessments (EIAs) or overseeing the EIA process, playing a crucial role in ensuring that development projects and activities comply with environmental regulations and guidelines to minimize negative impacts on the environment. Further, the Environment Management Act (LR 79/2018) of Somaliland creates a Somaliland Environmental Authority (SEMA) with membership from different ministries ranging from Mining, Fisheries, Water, Planning, Agriculture, Livestock and Industry. It further provides that the MoECC shall prepare and adopt guidelines for Environmental and Social Impact Assessment (ESIA) on proposed actions which may affect the country’s natural and social environment, as provided for under the ESIA Operational Guidelines¹⁰ which serve as the basic administrative directive.

The MoECC has a number of priorities, including institutional capacity development; climate change adaptation; biodiversity management, national range land rehabilitation, ecological improvement and management; reduction of charcoal production and increasing of alternative energy. The government of Somaliland has also enacted a number of land and environmental laws including Urban Land Management Law 2001 (amended 2008) and Somaliland Environmental Management Act 2014 which contains the EIA regulations.

In addition to the MoECC, other Ministries such as MoES (as the Project proponent), Ministry of Public Works Land and Housing (MoPWH), Ministry of Interior (MoI) and Ministry of Agricultural Development (MoA), Ministry of Rural Development (MoRD), and others are to be consulted before any infrastructure activities in the selected locations with potential environmental and social risks and impacts. In addition, the Ministries are mandated to supervise all matters relating to the environment including the review and approval of ESIA and Resettlement Action Plans (RPs). These relevant ministries are also mandated to supervise, and co-ordinate all matters relating to the environment and beneficiary communities. They will likely want to review and approve the safeguards documents such as ESMPs and Resettlement Plans (RPs) during schools’ construction and overall implementation of the Project.

2.2 WORLD BANK ESF REQUIREMENT ON RESETTLEMENT

World Bank’s Environmental and Social Standard⁵ (ESS5) on Land Acquisition, Restrictions on Land Use and Involuntary Resettlement is applicable for land matters related to SURP II. ESS5 recognizes that project-related land acquisition and restrictions on land use can have adverse impacts on communities and persons. It acknowledges that project-related land acquisition or restrictions on land use may cause physical displacement (relocation, loss of residential land or loss of shelter), economic displacement (loss of land, assets or access to assets, leading to loss of income sources or other means of livelihood), or both. The term “involuntary resettlement” refers to these impacts.

Resettlement is considered involuntary when affected persons or communities do not have the right to refuse land acquisition or restrictions on land use that result in displacement.

The objectives of World Bank's policy on project induced land matters are;

- To avoid involuntary resettlement or, when unavoidable, minimize involuntary resettlement by exploring project design alternatives.
- To avoid forced eviction.
- To mitigate unavoidable adverse social and economic impacts from land acquisition or restrictions on land use by: (a) providing timely compensation for loss of assets at replacement cost⁶ and (b) assisting displaced persons in their efforts to improve, or at least restore, their livelihoods and living standards, in real terms, to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher.
- To improve living conditions of poor or vulnerable persons who are physically displaced, through provision of adequate housing, access to services and facilities, and security of tenure.
- To conceive and execute resettlement activities as sustainable development programs, providing sufficient investment resources to enable displaced persons to benefit directly from the project, as the nature of the project may warrant.
- To ensure that resettlement activities are planned and implemented with appropriate disclosure of information, meaningful consultation, and the informed participation of those affected.

ESS5 applies to permanent, temporary, full, partial, physical and economic displacement resulting from the following types of land acquisition or restrictions on land use undertaken or imposed in connection with project implementation.

- Land rights or land use rights acquired or restricted through expropriation or other compulsory procedures in accordance with national law;
- Land rights or land use rights acquired or restricted through negotiated settlements with property owners or those with legal rights to the land, if failure to reach settlement would have resulted in expropriation or other compulsory procedures;
- Restrictions on land use and access to natural resources that cause a community or groups within a community to lose access to resource usage where they have traditional or customary tenure, or recognizable usage rights. This may include situations where legally designated protected areas, forests, biodiversity areas or buffer zones are established in connection with the project;
- Relocation of people without formal, traditional, or recognizable usage rights, who are occupying or utilizing land prior to a project-specific cut-off date;
- Displacement of people as a result of project impacts that render their land unusable or inaccessible;
- Restriction on access to land or use of other resources including communal property and natural resources such as marine and aquatic resources, timber and non-timber forest products, fresh water, medicinal plants, hunting and gathering grounds and grazing and cropping areas;

- Land rights or claims to land, or resources relinquished by individuals or communities without full payment of compensation⁸;
- Land acquisition or land use restrictions occurring prior to the project, but which were undertaken or initiated in anticipation of, or in preparation for, the project.

2.3 GAP ANALYSIS BETWEEN COUNTRY LEGISLATIONS AND WORLD BANK SAFEGUARDS REQUIREMENTS

This section compares the different laws from Somaliland with the World Bank's ESS5. Specifically addressed are consultation requirements, eligibility for compensation, valuation method, grievance mechanism, disclosure of information and the timing of compensation payments. For the SURP II AF4 the Bank's ESS5 will take precedence over any of these other laws as indicated in **Table 5**.

Table 5: Comparative Gap Analysis of Somaliland Laws and Policies and WB ESS5

Item	Somaliland Law/Policy	World Bank Requirements (ESS5)	Gaps	Gap filling measures
Management of Resettlement Impacts.	The Somaliland Constitution addresses the resettlement of affected persons primarily through provisions related to land rights, property ownership, and the protection of those displaced by development. It emphasizes the need for fair compensation and the right of individuals to have a say in decisions affecting their homes and livelihoods. The Urban Land Management	Provides for clear resettlement management processes, clear roles and responsibilities with adequate human and financial resources to manage resettlement impacts. No forced eviction is allowed.	The national laws also provide provisions related to land rights, property ownership, and the protection of those displaced by development. There are however, noted gaps in applying and enforcing the law. Forced eviction has been a significant concern, particularly regarding the rights of individuals and communities displaced due to development projects, urban	World Bank's ESS5 guidelines, RPF and RAPs to guide the resettlement processes.

⁸ In some circumstances, it may be proposed that part or all of the land to be used by the project is donated on a voluntary basis without payment of full compensation. Subject to prior Bank approval, this may be acceptable providing the Borrower demonstrates that: (a) the potential donor or donors have been appropriately informed and consulted about the project and the choices available to them; (b) potential donors are aware that refusal is an option, and have confirmed in writing their willingness to proceed with the donation; (c) the amount of land being donated is minor and will not reduce the donor's remaining land area below that required to maintain the donor's livelihood at current levels; (d) no household relocation is involved; (e) the donor is expected to benefit directly from the project; and (f) for community or collective land, donation can only occur with the consent of individuals using or occupying the land. The Borrower will maintain a transparent record of all consultations and agreements⁸ reached. See ESS5, footnote 10.

Item	Somaliland Law/Policy	World Bank Requirements (ESS5)	Gaps	Gap filling measures
	Law No. 17/2001 (revised 2008) to regulate the utilization, administration, and planning of urban land to promote sustainable development, ensure efficient land use, and protect the rights of land users.		expansion, or conflict.	
Consultation.	<p>The Constitution emphasizes on community participation in decision-making processes regarding development projects that might lead to resettlement. It also requires that special consideration is given to vulnerable populations to ensure their rights and needs are prioritized during the resettlement process.</p> <p>The Urban Land Management Law encourages public participation in the urban planning process, ensuring that the views and needs of the community are considered in land management decisions.</p>	Project Affected Persons (PAPs) facing physical or economic displacement persons must be meaningfully consulted to express their concerns and discuss ways to minimize impacts on affected communities. PAPs also should have opportunities to participate in planning and implementing resettlement programs.	The National legal framework doesn't provide clear consultation process prior or during land expropriation.	World Bank's ESS5 guidelines, RPF and RAPs to guide decisions on consultations in addition to local laws. The project team will also be guided by the SEF which has a detailed GM process and an inclusion plan.

Item	Somaliland Law/Policy	World Bank Requirements (ESS5)	Gaps	Gap filling measures
Compensation.	<p>The Constitution recognizes the right to property and outlines the legal processes involved in acquiring and resetting land.</p> <p>It further states that Private property acquired lawfully shall not be expropriated except for reasons of public interest and provided that prompt compensation is paid based on the market value.</p> <p>Also, it mandates that individuals or communities affected by resettlement should receive adequate compensation, ensuring that they are not left worse off after displacement.</p> <p>Eligible PAPs have a right to be compensated with the same value of the affected property. It is, however, unclear how this value is set or determined by the responsible government agencies.</p>	<p>World Bank recognizes three classes of PAPs eligible for compensation:</p> <ol style="list-style-type: none"> 1. Those with formal legal rights to land (including customary and traditional rights recognized under the laws of the country); 2. Those who do not have formal legal rights to land at the time of census, but have a claim that is recognized under the laws of the country; 3. Those who have no recognizable legal right or claim to the land they are occupying (e.g., squatters, encroachers). <p>Types of losses to be compensated include physical and economic displacements and cover land, residential or commercial structures, and lost income caused by temporary or permanent economic displacement.</p>	<p>ESS5 further defines types of losses to be compensated to include physical and economic displacements that cover land, residential or commercial structures, and lost income caused by temporary or permanent economic displacement.</p> <p>While under Article 31 of the Constitution people have a right to be compensated, it is not clear how the amount for compensation is determined.</p> <p>ESS5 requires full replacement costs for all assets but the law does not determine compensation schedule and cut-off date.</p> <p>ESS5 determines that improvements in the living situations of displaced vulnerable people should be undertaken, which is not provided for under the Law.</p>	<p>World Bank's ESS5 guidelines and RAP are to guide decisions on compensation.</p>

Item	Somaliland Law/Policy	World Bank Requirements (ESS5)	Gaps	Gap filling measures
			Government methods may not ensure full replacement value, but the Bank requires full replacement cost for all lost assets.	
Cut-Off Date	Issues on compensation payment schedule and cutoff date are not addressed in the law.	ESS5 recommends cut-off date to be established at the time of census and asset survey and that compensation is agreed upon with PAPs and provided prior to taking over assets or relocation.	Issues on compensation payment schedule and cutoff date are not addressed in the law.	World Bank's ESS5 guidelines and RAP to guide on the cut-off date approach.
Vulnerable groups.	Somaliland has established a legal framework aimed at protecting vulnerable groups, including women, children, persons with disabilities, and marginalized ethnic communities. The Constitution of Somaliland guarantees fundamental rights and freedoms for all citizens, emphasizing equality and prohibiting discrimination based on gender, ethnicity, disability, or social status. Overall, while	The objective of World Bank ESS5 is to improve living conditions of poor or vulnerable persons who are physically displaced, through provision of adequate housing, access to services and facilities, and security of tenure.		World Bank's ESS5 guidelines and RPF/RAPs to guide the activities on identifying, engaging and consulting vulnerable groups. The project team will also be guided by the SEP, which has a detailed GRM process and an inclusion plan.

Item	Somaliland Law/Policy	World Bank Requirements (ESS5)	Gaps	Gap filling measures
	Somaliland's legal framework addresses many concerns relevant to vulnerable groups, ongoing challenges remain in enforcement, awareness, and resource allocation. Such groups (including, pastoralists, persons with disabilities, IDPs) and minority clans.			
Access to Information.	The National Framework doesn't provide clear information on right to access information prior or during land expropriation.	World Bank requires disclosure by Bank at its website, and simultaneous public in-country disclosure by clients' websites or other readily accessible public disclosure means. Information should be disclosed in language(s) understood by the PAPs and other stakeholders.	While there have been efforts to improve access to information through digital platforms and community programs, challenges remain, such as limited internet connectivity in rural areas and restrictions on certain types of information. The key challenge is ensuring that those located in remote rural areas and the disadvantaged groups (e.g. IDPs, pastoralists, nomads, and persons with disabilities, women from female headed households etc.) receive	World Bank's ESS5 guidelines, RPF and RAPs/RPs to guide decisions on access to information. The project team will also be guided by the SEP, which has a detailed GRM process and an inclusion plan.

Item	Somaliland Law/Policy	World Bank Requirements (ESS5)	Gaps	Gap filling measures
			information using structures and channels that are accessible to them.	
Grievance Mechanism.	<p>The Constitution guarantees legal avenues for those affected by resettlement to seek redress and protection of their rights.</p> <p>The Urban Land Management Law No. 17/2001 revised in 2008 provides mechanisms for resolving land disputes that may arise between individuals or between individuals and the state. This may include mediation or formal legal processes.</p> <p>There are initiatives that establish dedicated offices or online platforms where citizens can register their issues. These platforms provide a transparent process for handling complaints and ensure that grievances are addressed in a timely and systematic</p>	<p>The World Bank policy requires project-level grievance mechanism to cover resettlement, and related compensation matters and operations.</p>	<p>Law courts may be cumbersome, costly or intimidating remedy, especially for those with no formal land titles, IDPs, refugees, those unable to read or write and should be used only as last resort</p>	<p>The project will implement a GRM that will address all matters related to the planning and implementation including resettlement related complaints.</p> <p>-Adopt a more transparent and participatory approach could be developed to manage grievances related to land use for the AF project activities.</p> <p>-The project team will also be guided by the SEP which has a detailed GRM process and an inclusion plan..</p>

Item	Somaliland Law/Policy	World Bank Requirements (ESS5)	Gaps	Gap filling measures
	<p>manner. Disputes that arise from asset valuations or compensation matters can typically be handled through local courts or arbitration, depending on the nature of the disagreement and the parties involved.</p> <p>rely heavily on resolving land disputes through informal and community-centered settlement processes led by clan elderly people. The government land dispute system also sometimes refers to community/clan elder leaders to intervene in resolving land disputes.</p>			
Valuation Method.	<p>The legal framework in Somaliland provides some guidance on the valuation of affected assets. Practitioners often rely on a combination of legal provisions, market practices, and community engagement to conduct effective valuations.</p>	<p>The Bank requires full replacement cost for all lost assets.</p>	<p>Government methods may not ensure full replacement value.</p>	<p>World Bank's ESS5 guidelines and RAP are to be followed.</p>

3 PRINCIPLES GUIDING RESETTLEMENT

3.1 MITIGATION HIERARCHY TO ADDRESS RESETTLEMENT UNDER SURP II AND THE AF

This RPF is intended to ensure that any possible adverse land-related impacts of subproject activities are addressed through appropriate mitigation measures. These risks will be minimized by:

- Avoiding and minimizing the impact of the physical and economic displacement of people to the extent possible with a well-designed compensation and relocation process;
- Compensating for losses incurred and displaced incomes and livelihoods; and
- Ensuring resettlement assistance or rehabilitation, as needed, to address impacts on PAPs livelihoods and their wellbeing.

3.2 PRINCIPLES THAT GUIDE RESETTLEMENT UNDER SURP II AF4

The following are key principles that will guide the implementation of this RPF and the RAPs:

- The policy applies to displaced or impacted persons regardless of the total number involved, severity of the impact, the socio-economic status of affected-persons, whether or not they have legal right or claim to the land they are occupying, including those who may not be protected through the Somaliland and state level compensation legislation;
- Where feasible, involuntary resettlement and land acquisition should be avoided or minimized by exploring all viable alternatives;
- Physical displacement (relocation or loss of shelter) will be considered only on an exceptional basis where the timely compensation and assistance pursuant to this RPF is feasible;
- Where relocation or loss of shelter is considered, measures to assist displaced persons should be implemented in accordance with the RAP;
- The planning and implementation of the resettlement process should be conducted in a consultative manner with all PAPs and stakeholders;
- Absence of legal title to land should not be a basis for denying compensation and resettlement assistance. All eligible PAPs will be compensated for losses resulting from project interventions;
- Displacement or restriction to access should not occur before necessary measures for resettlement and compensation are in place. Apart from compensation, these measures should include provision of other assistance required for relocation, prior to displacement, and preparation and provision of settlement sites with adequate basic facilities;
- The displaced must be relocated to areas with social infrastructure and basic amenities like schools, potable water, health facilities, etc.;

- All eligible PAPs should be assisted to restore their incomes and livelihood sources to at least pre-resettlement levels. Particular attention will be paid to the needs of vulnerable groups, such as the elderly, women and children, those with disabilities, and the landless, among others;
- Wherever possible, those impacted by involuntary resettlement should be considered for employment in various project activities including construction works and provision of other services;
- Vulnerable groups may need further support in addition to compensation entitlement;
- All compensation will be calculated at replacement value;
- There will be no deduction of depreciation and salvage value from compensation for assets;
- No voluntary land donation will be accepted, and
- A Grievance Mechanism will be available to all PAPs in a timely manner.

4.1 GENERAL CRITERIA FOR ELIGIBLE PAPs

Paragraph 10 of ESS5 defines three categories of affected persons who are eligible for coverage under ESS5. While people in all three categories are entitled to assistance under ESS5, the nature of assistance may vary, as subsequent paragraphs of ESS5 clarify.

- Category (a): Affected persons who have formal legal rights to land or assets are those who have formal documentation under national law to prove their rights or are specifically recognized in national law as not requiring documentation. In the simplest case, an area is registered in the name of individuals or communities. In other cases, persons may have a lease on the land and therefore have legal rights.
- Category (b): Affected persons who do not have formal rights to land or assets, but who have a recognized or recognizable claim under national law. They may have been using the land for generations without formal documentation under customary or traditional tenure arrangements that are accepted by the community and recognized by national law. In other cases, they may have never been provided formal title or their documents may be incomplete or lost. They may have a claim for adverse possession if they have occupied land for a certain period of time as defined by national law, without the formal owner contesting the occupation. In such cases, national law often has legal procedures by which such claims can become recognized.
- Category (c): Affected persons who have no recognizable legal right or claim to the land or assets they occupy, or use are eligible for assistance under ESS5. Affected persons in these groups are not eligible for compensation for land but are eligible for resettlement and livelihood assistance and compensation for assets. Those who encroach on the project area after the cut-off date are not eligible for compensation/assistance under SURP II AF4.

4.2 DISADVANTAGED/VULNERABLE GROUPS ELIGIBLE FOR SPECIAL ATTENTION/ASSISTANCE.

Paragraph 11 of the ESS 5 refers to the importance of taking into account resettlement impacts on the poor and vulnerable in project design. It is especially important to avoid physical or economic displacement of those socially or economically vulnerable to hardship as a result. Vulnerable groups may have different land needs from most households or particularly adverse impacts from resettlement. Based on the experience in SURP, potential vulnerable groups relevant to AF4 may include:

- Widows/Female headed households;
- Single women who may be dependent on sons, brothers, or others for support;
- Elderly;
- Persons with disabilities;
- Persons living with HIV/AIDS or other debilitating illnesses;
- Internally displaced persons (IDPs), refugees or returnees, living by themselves as a group or with host families;
- Orphans and/or street children, and
- Ethnic minorities and other socially or economically marginalized groups.

These group types are not mutually exclusive, and a female heading a household may be a small business owner or an orphan may be an HIV/AIDS affected person. Since these groups are particularly vulnerable to physical or economic displacement, the following considerations will be made when subproject sites are identified, and PAPs listed. In addition, the list of vulnerable groups above is not an exhaustive list. The socioeconomic survey which will be done for preparation of sub project specific RAPs needs to be thorough in identifying the categories of affected people and their sources of livelihoods. The following considerations will be made when project sites are identified, and PAPs listed:

- Special consideration should be paid to these groups by identifying their needs from the socio-economic and baseline studies undertaken as part of the RAP process;
- The groups should be individually consulted and given opportunities to participate in the resettlement decision-making process, as well as project activities;
- Consultation with these groups should ensure that resulting resettlement and compensation improves their pre-project livelihood;
- The RAPs should be designed to ensure special attention is paid to the monitoring of the resettlement process in order to ensure that pre-project livelihoods are indeed improved upon;
- PAPs should be given sufficient technical and financial assistance to make use of the grievance mechanisms of the project where required and
- Decisions concerning them should be made in the shortest possible time.

4.3 ELIGIBILITY FOR COMMUNITY ASSETS

It is also important to note that the eligibility may be claimed collectively e.g., as a community or religious group and does not necessarily have to be individuals or families. Communities (on communal lands) that permanently lose land and/or access to assets and or resources under statutory or customary rights will be eligible for compensation. Example of community compensation could be for public toilets, mosques, religious schools, cattle crushes/dips, weather stations, cottage/marketplaces, off farm research demonstrations, community water pans.

4.4 METHOD OF ESTABLISHING OWNERSHIP

The ownership of assets will be established through the municipality which has records of ownership, e.g., through taxation records, and also to be confirmed by the GRC which is comprised of community members including elders.

4.5 METHODOLOGY FOR ASSETS VALUATION AND COMPENSATION

Pursuant to ESS5, AF4 will provide timely compensation for loss of assets at replacement cost. Replacement cost is defined as a method of valuation yielding compensation sufficient to replace assets, plus necessary transaction costs associated with asset replacement. Where functioning markets exist, replacement cost is the market value as established through independent and competent real estate valuation, plus transaction costs. Where functioning markets do not exist, replacement cost may be determined through alternative means, such as calculation of output value for land or productive assets, or the undepreciated value of replacement material and labour for construction of structures or other fixed assets, plus transaction costs. In all instances where physical

displacement results in loss of shelter, replacement cost must at least be sufficient to enable purchase or construction of housing that meets acceptable minimum community standards of quality and safety. Transaction costs include administrative charges, registration or title fees, reasonable moving expenses, and any similar costs imposed on affected persons.

Where specialized asset valuations may be necessary under AF4, a valuation expert should be contracted by the respective municipalities through the PIUs at the project outset to develop a standardized procedure for asset valuation, which can then be applied in each subproject. Such procedure would necessarily be developed using legally acceptable valuation procedures accepted by World Bank for purposes of fairness and consistency (where functioning legal framework exists).

4.6 VALUATION OF COMPENSATION FOR FLORICULTURAL AND TREES

Market valuation method must be adopted. This goes for all tree-based crops including trees of nutritional, medicinal and other significant economic value. Given their significance to the local subsistence economy, fruit trees will be compensated on a combined replacement/market value. Fruit trees used for commercial purposes will be compensated at market value based on historical production records. If the households are physically resettled, they will be compensated for the labour invested in the trees they leave behind, because they will continue to own the trees left behind under customary rights. It is not uncommon for individuals to own trees in other villages in which they formally lived and, in some cases, to continue to harvest fruit from those trees for subsistence purposes and/or sale to traders. If a household/individual chooses to transfer ownership of the trees, transfer costs will be paid in addition to labour costs. The compensation rate will be based on information obtained from the socio-economic survey.

4.7 ENTITLEMENT MATRIX

Table 6 below presents the matrix of entitlements for different types of resettlements or loss of incomes or assets. As appropriate, the matrix will be reviewed and updated during the project implementation to reflect the evolving fragile socio-economic local contexts of individual municipalities, while carefully maintaining the consistency with relevant requirements of ESS5.

Table 6: Matrix of Entitlements for Different Types of Resettlements Or Loss Of Incomes Or Assets

Asset	Type of Impact	Entitled Person (s)	Entitlement
Commercial⁹ Land	No Displacement: Land used for business partially affected, limited temporary loss.	Owner	<ul style="list-style-type: none"> • Compensation in cash at full replacement value for affected land.
		Tenant (including IDPs/Returnees)	<ul style="list-style-type: none"> • Assistance with finding new rental/lease location if temporary or permanent move necessary. • Rent and deposit refund along with relocation assistance to cover moving costs.
	Displacement: Premise used for business are severely affected, the remaining area insufficient for continued use.	Owner	<ul style="list-style-type: none"> • Land for land replacement with land of equivalent size and market potential; or compensation in cash at full replacement value according to PAP's choice. • Assistance in finding new location.
		Tenant (including IDPs/Returnees)	<ul style="list-style-type: none"> • Cash compensation equivalent to 1 month of net income based on estimates from comparable businesses. • Assistance in finding new rental/lease location. • Relocation assistance including 1-month rental assistance and coverage of moving costs to re-establish the business. • Livelihood restoration assistance if required (assistance with job placement, skills training).
Residential Land	No Displacement Land used for residence partially affected, and/or limited temporary loss, and the remaining land remains viable for present use	Owner	<ul style="list-style-type: none"> • Compensation in cash at full replacement value for affected land.
		Tenant	<ul style="list-style-type: none"> • Assistance with finding new rental/lease location if temporary or permanent move necessary. • Rent and deposit refund along with relocation assistance to cover moving costs.
	Displacement: Premise used for residence severely affected, remaining area insufficient for continued use or	Owner	<ul style="list-style-type: none"> • Land for land replacement with land of equivalent size and market potential, locational advantages and security of tenure; or compensation for full replacement value in cash according to PAP's choice. • Assistance with finding new land.
		Tenant	<ul style="list-style-type: none"> • Rent for two months and deposit refund along with relocation assistance to cover moving cost.

Asset	Type of Impact	Entitled Person (s)	Entitlement
	becomes smaller than minimally accepted under zoning law/s.	Informal dwellers (including IDPs/Returnees)	<ul style="list-style-type: none"> Assistance with finding new rental/lease location. No compensation for land (see below compensation/assistance for affected buildings and structures of informal dwellers). Assistance with finding new rental/lease locations. Relocation assistance to cover moving cost.
Buildings and Structures	No Displacement: Structure partially affected, but the remaining premise remains viable for continued use.	Owner	<ul style="list-style-type: none"> Like for like replacement or cash compensation for affected structure per PAP's choice. Restitution work or cash assistance to cover the cost of restoration of the remaining structure per PAP's choice.
		Tenant	<ul style="list-style-type: none"> Cash compensation for affected assets (any verifiable improvement to the property) and disturbance compensation equivalent to 1 month's rent.
	Displacement Entire structure affected OR the structure is partially affected but the remaining structure is not suitable for continued use.	Owner	<ul style="list-style-type: none"> Cash compensation at full replacement cost for the entire structure and other fixed assets without depreciation, or construction/provision of alternative structure which is acceptable to the PAP. Right to salvage material without deduction from compensation. Relocation assistance to cover moving cost.
		Tenant	<ul style="list-style-type: none"> Cash compensation for any verifiable improvement to the property, rent and deposit refund. Relocation assistance to cover moving cost. Right to salvage material without deduction from compensation.
		Street vendors	<ul style="list-style-type: none"> Cash compensation equivalent to 1 month of net income based on estimates from comparable businesses collected during census survey. Right to salvage material without deduction from compensation. Relocation assistance to cover moving cost.
		Informal dwellers (including IDPs/Returnees)	<ul style="list-style-type: none"> Provide arrangements to allow them to obtain adequate housing with security of tenure. Where these displaced persons own structures, compensation for the loss of assets other than land, such as dwellings and other improvements to the land, at replacement cost. Based on consultation with such displaced persons, relocation assistance in lieu of compensation for land sufficient for them to restore their standard of living at an adequate alternative site will be provided.

Asset	Type of Impact	Entitled Person (s)	Entitlement
Trees	Cut/uprooted (loss of timber or fruit).	All PAPs	<ul style="list-style-type: none"> Cash compensation for full replacement market value of the produce of one tree for two years, assistance in establishing replacement trees.
Standing crops	Crops affected by land acquisition or temporary acquisition or easement.	All PAPs	<ul style="list-style-type: none"> Cash compensation is equivalent to the average of the last 3 years of market value for the mature and harvested crops.
Business	Loss of Access.	All PAPs	<ul style="list-style-type: none"> Cash compensation equivalent to 100% of the net monthly income to be paid to affected persons as transitional support until construction is completed. Provide the opportunity for businesses to operate in nearby locations until construction is completed. Compensation amounts will be based on estimates from comparable businesses or income declared during the census. Assistance to help find alternative temporary or permanent locations to re-establish business. Right to salvage material without deduction from compensation. Livelihood restoration assistance if required (assistance with job placement, skills training).
Community building	Temporary loss of access.	All PAPs	<ul style="list-style-type: none"> Cash compensation to cover up to one-month public transportation cost to the nearest same facility in the town/city.
	Displacement.	Owner	<ul style="list-style-type: none"> Like for like structure replacement or cash compensation at full replacement cost for the entire structure and other fixed assets without depreciation, or alternative structure which is acceptable to the PAP. Right to salvage material without deduction from compensation. Relocation assistance to cover moving cost. Assistance with finding new location.
		Tenant	<ul style="list-style-type: none"> Cash compensation at full replacement cost for any verifiable improvement to the property. Rent and deposit refund. Relocation assistance to cover moving cost. Assistance with finding new location.

Asset	Type of Impact	Entitled Person (s)	Entitlement
Vulnerable Groups	Any of the above impacts.	<p>May include:</p> <ul style="list-style-type: none"> •Widows/Female headed households; •Single women dependent on sons, brothers, or others for support; •Elderly; •Persons with disabilities; •Persons living with HIV/AIDS or other debilitating illnesses; •Internally displaced persons (IDPs), refugees or returnees, living by themselves as a group or with host families; •Orphans and/or street children; •Socially or economically marginalized groups. 	<p>Any of the following measures if needed:</p> <ul style="list-style-type: none"> • Additional assistance for finding replacement land, housing, places of business and for moving (temporarily or permanently). • Additional assistance for the new land to be cleared or structures to be built. • Additional livelihood restoration support. • Psychosocial counseling to adjust to physical or economic displacement.

5 PROCESS FOR SCREENING, PREPARING AND APPROVING RAPs

5.1 SCREENING

The preparation of sub-project RAPs will begin with screening. This is done to identify the land/ areas that may result in resettlement impacts, types, and nature of potential impacts and to provide adequate measures to address them. This process will ensure that PAPs are:

- Informed about their options and rights pertaining to resettlement;
- Included in the consultation process and given the opportunity to participate in the selection of technically and economically feasible alternatives, and
- Provided prompt and effective compensation at full replacement cost for losses of assets and access attributable to the sub-project(s).

The screening process will be led by the implementing municipalities and will be conducted with full participation and consultation with PAPs. If the screening process indicates a need for resettlement, then a socio-economic survey, census, and land asset inventory to determine the extent of resettlement required will be conducted and followed by the preparation of RAP for each sub-project.

5.2 DISPLACEMENT PRIOR TO PROJECT APPROVAL

Internally displaced persons (IDPs), who fled from drought and violence, have settled on the periphery of Hargeisa city. In 2022, the Hargeisa Municipality cleared illegal structures to open roads that had been blocked by squatters without compensation. These demolitions were not conducted in anticipation of the SURP 2 project. However, if AF4 interventions are planned in areas where forced evictions occurred, relevant ESS5 requirements will be applied retroactively.

The PCU has created a comprehensive understanding of the ESF especially retroactive application to the Hargeisa team. Follow-up consultations with the Municipality, noted the Hargeisa City's commitment to avoiding forced eviction under AF4, and to paying compensation to affected persons.

If the ESF requirements cannot be satisfied retroactively, the Bank will not be able to support the roads (or any other project-financed infrastructure) where forced displacement took place. More details are provided in Section 5. The PCU has created a comprehensive understanding of the ESF especially retroactive application to the Hargeisa team. Follow-up consultations with the Municipality, noted the Hargeisa City's commitment to avoiding forced eviction, and to paying compensation to affected persons.

When the screening is conducted, the municipality will ascertain that the road ROW has not experienced such forced displacement. This will be also re-confirmed with the host communities of project roads (subject to review by the engineering and supervision consultant and the World Bank). If the occurrence of such forced displacement is identified, a due diligence review (also called as "social audit") will be conducted to:

- (a) document and assess the adequacy of mitigation measures that were taken for the forced displacement;
- (b) identify gaps in meeting the requirements of ESF;

(c) identify any complaints, grievances, or other outstanding issues, and

(d) determine measures to close identified gaps and address complaints.

If the ESF requirements cannot be satisfied retroactively, the Bank will not be able to support the roads (or any other project-financed infrastructure) where forced displacement took place.

5.3 CENSUS OF PROJECT AFFECTED PERSONS

Following the screening, a census of PAPs will be conducted to determine their number and record their socio-economic profile prior to the beginning of civil works. This information will be used to measure the magnitude of the impacts on PAPs and for future monitoring. A cut-off date will be publicly announced to indicate the beginning of the census. The cut-off date will be announced in community centers; posters will be displayed in visible congregation areas (subject to overriding security concerns); and will be published in local newspapers. Information to be collected will at least include; personal details of PAPs including family members and the monthly income generated from the ongoing economic activities before the census. A sample census questionnaire is provided in Annex 2.

5.4 CUT-OFF DATE

Cut-off date is the date of commencement of the census of PAPs within the project area boundaries. Cut-off dates are essential in the process of drawing up lists to ensure that ineligible persons do not take the opportunity to claim eligibility. The cut-off date for this project shall be determined by the PIU with, and in consultation with relevant traditional authorities, as appropriate. Those who encroach on the project area after cut-off date are not eligible for compensation and assistance under this RPF, provided that the cut-off date has been clearly established and extensively made public.

Cut-Off Date Approach

1. Definition and Purpose: The cut-off date shall be established by the PIU to determine eligibility for compensation or assistance for affected individuals or families. It will serve to define who is eligible for resettlement support, ensuring that only those who occupied or used the land or resources before this date are considered.

2. Notification: Affected individuals shall be adequately informed about the cut-off date, through e.g. community meetings, written notifications, or public announcements to ensure that everyone understands the implications. In addition, the PIU shall set-up an information desk manned by the Community Engagement Officer.. The timely awareness raising by the government on the cut-off date and the consequences of encroachment after the cut-off date shall be part of the consultation process.

3. Documentation: The PIU shall document the status of households or individuals before the cut-off date. This may include land ownership, usage rights, or occupancy records that help validate claims for compensation or resettlement.

4. **Fairness:** The cut-off date shall be implemented in a manner that is transparent and fair, minimizing disputes among affected parties. Clear criteria to be established to avoid any biases or inequalities in the compensation process.

5. **Grievance Mechanism:** The project grievance mechanism shall be utilized for addressing grievances related to the cut-off date. This will allow individuals to appeal or seek clarification if they believe they have been incorrectly excluded from the benefits.

6. **Consistency with Legal Frameworks:** The cut-off date principle will align with local laws and regulations governing land tenure and resettlement as well as the World Bank policies. This will ensure that the process is legally sound and respects the rights of affected populations.

7. **Time Frame:** The cut-off date shall be relevant to the timeline of the resettlement project, providing enough time for assessments, consultations, and notifications before actual resettlement activities begin.

8. **Post-Cut-off Monitoring:** After establishing the cut-off date, it will be necessary to monitor the area for new occupiers or claimants. This will help maintain the integrity of the resettlement process and to ensure compliance with the established cut-off.

5.5 PREPARATION AND IMPLEMENTATION OF RAPs

The preparation and implementation of subproject-specific RAPs will be carried out by the PIU and led by the PIU's E&S specialist and Community Engagement Officer, who, depending on available funding, may rely on outside consultants for assistance. The schedule for the implementation of individual RAPs will be determined once subproject sites have been identified. The schedule will be prepared based on the principles of this RPF, and must be agreed between the PIU, relevant municipality and/or other government jurisdiction, and affected PAPs as outlined in the Somaliland laws and World Bank ESF requirements. The timeline for implementing the RAP will ensure that no individual or affected household would be displaced (economically and/or physically) due to civil works activity before compensation is paid and resettlement sites with adequate facilities are prepared and provided for to the individual or homestead affected. **Table 7** below summarizes the content of a RAP¹⁰.

Table 7: Contents of a RAP (ESS5)

- | |
|--|
| <ul style="list-style-type: none">• Description of project and its potential impact;• Objectives;• Census survey and baseline socioeconomic studies;• Legal Framework;• Institutional framework;• Eligibility;• Valuation of and compensation for losses;• Community Participation; |
|--|

¹⁰ This table is prepared consistent with ESS5 annex 1

- Implementation Schedule;
- Costs and Budgets;
- Grievance Mechanism;
- Monitoring and Evaluation (including RAP audit);
- Arrangement for adaptive management;
- Additional planning requirements where resettlement involves physical displacement (transitional assistance, site selection, site preparation, and relocation, housing, infrastructure, and social services, environmental protection and management, consultation on relocation arrangements, and Integration with host populations), and
- Additional planning requirements where resettlement involves economic displacement (Direct land replacement, Loss of access to land or resources, Support for alternative livelihoods, Consideration of economic development opportunities, and transitional support).

REVIEW AND APPROVAL OF RAPS

Once the draft is completed, the RAP will be submitted to the implementing agency (municipality) and the World Bank for review and approval. Individual RAPs will be translated into local language (Somali), disclosed on the external website of the Ministry of public works and implemented, following the review and clearance.

5.7 EXPERIENCE IMPLEMENTING THE RPF UNDER SURP II AND AF 1,2 and 3

The PIUs have ensured that site-specific RAPs are prepared, approved by the Bank, and implemented before commencement of project activities. The PIUs compensate all affected persons for any physical and/or economic impacts promptly. No resettlement has been undertaken under the project, with proposed investments being dropped in Mogadishu due to the inability of the PIU to resettle IDP squatters living within the right of way on one of the community roads. Complaints raised under the project include; the case of encroachment after the cut-off date in Kismayo. Further, the PCU carries out RAP implementation audits to ensure compliance by each municipality. Annex 5 captures a sample RAP.

6 IMPLEMENTATION SCHEDULE, COSTS AND ARRANGEMENTS

6.1 IMPLEMENTATION SCHEDULE

Each subproject will prepare an individual implementation schedule, which will be included in the RAP to ensure the consistency and the right sequence of investment activities and the resettlement process. The RAP will include an implementation schedule for each activity covering initial baseline and preparation, actual relocation, commencement of civil works and post relocation economic and social activities. The plan will include a target date when the expected benefits for resettled persons and host community, if relevant, would be provided. Arrangements for monitoring of implementation of the resettlement and evaluating its impact will be developed during the preparation of individual RAPs implementation schedules. Target dates for achievement of expected benefits to resettled persons and hosts will be set and the various forms of assistance to the resettled persons will be disseminated to them. While works may begin on portions of subproject sites where there is no resettlement or compensation, no works may begin on those portions where physical or economic displacement will occur until all relocation of people and structures and related compensation have been completed.

6.2 IMPLEMENTATION BUDGET

The RAP will include an itemized and adequate budget for the implementation of resettlement activities including compensation. At the project preparation stage where the RPF is prepared, the exact number of people who may be affected cannot be determined since all the sub-projects have not been fully identified. As such, it is not possible to provide an estimate of the budget required to cover the total cost of resettlement that will result from the implementation of SURP II AF4. The budgets will cover resettlement activities including compensation cost for affected assets such as buildings, fruit trees, and loss of access. Funds for the preparation and implementation of the RAP will be financed through the project while funding for compensation will be provided by the local government. Adequate budget for stakeholder engagement will be also allocated from the overall project cost of SURP II, which will include cost for organizing meetings, workshops, and training, hiring of staff, field visits to subproject locations, translation and printing of relevant materials and operating GMs. The cost for environmental and social mitigation measures at construction sites (other than cost for resettlement) will be integrated into the construction cost and will be borne by the contractor. The costs of preparation of the RPF including capacity building and consultations are estimated to be 180,000USD. **Table 8** below provides a sample template for budgeting.

Table 8: Sample Template Budget for a RAP

Item	Amount or number	Total estimated cost	Agency responsible
Asset acquisition			
Land			
Structure			
Crops and economic trees			

Item	Amount or number	Total estimated cost	Agency responsible
Infrastructure			
Land Acquisition and preparation			
Land			
Structures			
Crops and economic trees			
Community Infrastructure			
Relocation			
Transfer of possessions			
Installation costs			
Economic rehabilitation/livelihood restoration			
Preparation and implementation of Livelihood Restoration Plans			
Training			
Capital Investment			
Technical Assistance			
RPF Implementation			
Stakeholder Engagement (consultations, disclosure, GM etc.)			
RAP and/or LRP Preparation			
Monitoring, evaluation, and RAP and/or LRP audit			
Contingencies (10%)			
TOTAL			

6.3 IMPLEMENTATION ARRANGEMENTS

SURP II AF4 will be implemented by Hargeisa Municipality (through a competitively recruited PIU that will be directly reporting to the Mayor). The PCU established at the federal Ministry of Public Works will be supporting the PIU. The municipality will have a resettlement committee (RC) and a GRC actively participating in the implementation of RAPs. The composition of the PIU, GRC, and RC are presented in **Table 9**.

Table 9: Composition of PIUs, GRCs, and the RCs

PIU Members	RC Members	GRC Members
<ul style="list-style-type: none"> • Project Coordinator; • Environmental and Social Specialists; • Female and Male Community Engagement Officers; • Monitoring and Evaluation Specialist; • Project Engineer; 	<ul style="list-style-type: none"> • Mayor/deputy mayor; • Municipal engineer; • PIU safeguards Specialist; • PIU engineer; • PIU procurement Specialist; 	<ul style="list-style-type: none"> • Clan elder/religious leader; • Women group member; • Youth group member; • 2 PAP representative (male and female); • District/zone Secretary, and

<ul style="list-style-type: none"> • Finance Specialist; • Procurement Specialist, and • Finance and Admin Officer. 	<ul style="list-style-type: none"> • Clan elder/religious leader from sub-project district/zone; • Women group member, and • PAP representative. 	<ul style="list-style-type: none"> • Female community engagement officer.
--	---	--

The PIU will have overall project implementation responsibility including; ensuring the timely availability of fund transfer to contractors; implementing the relevant E&S instruments including the RPF and RAPs; ensuring continuous community outreach and consultations; monitoring and evaluating program implementation and impacts; setting up the resettlement committees; developing and implementing the GM and reporting results to various stakeholders. The PIU will be supported by engineering supervision consultants responsible for monitoring the civil works. The PIU will also be supported by a third-party monitor (TPM) engaged by the Bank to provide monitoring support of subprojects. The E&S Specialist at the PIU will take the lead in management of resettlement issues. **Table 10** Error! Reference source not found. below shows the institutional roles and responsibilities for the implementation of this RPF.

Table 10: Institutional Roles and Responsibilities

Entity	Responsibility
Municipality of Hargeisa.	<ul style="list-style-type: none"> • Overall management and supervision of the project. • Payment of compensation.
PCU at the federal government level.	<ul style="list-style-type: none"> • Capacity support to the PIUs in safeguards implementation and monitoring.
PIU in Hargeisa municipality supported by engineering and supervision consultant.	<ul style="list-style-type: none"> • Project implementation and management. • Stakeholder engagement in and near project sites. • Supervision of all safeguard activities, including preparation and implementation of RAPs. • Internal monitoring and evaluation of resettlement and compensation activities.
RCs .	<ul style="list-style-type: none"> • Determination of asset or income losses incurred by PAPs and their valuation.
GRCs.	<ul style="list-style-type: none"> • Receiving and addressing project-level grievances, except for those under appeal or needing specific PIU intervention. • Reporting back to PIU and community on GM performance.
TPM agent/auditor.	<ul style="list-style-type: none"> • External Monitoring & Evaluation of resettlement and compensation activities including the preparation of completion audit.

7 CONSULTATION AND DISCLOSURE ARRANGEMENTS

7.1 PREPARATION AND IMPLEMENTATION PHASE

The PIU will ensure inclusivity of all targeted PAPs at all levels of the resettlement activities. The PAPs will be consulted through meetings at district level and neighbourhood level to provide preliminary accurate data relevant to resettlement. Information about the project, will be shared in a local language. Furthermore, data about socio-impacts of the sub-projects and the proposed mitigation measures to address resettlement and other key impacts will be disclosed to local newspapers and local radio stations and other media, where applicable.

During implementation, the PAPs will need to be informed about their rights and options for compensation/assistance, at which point they will have their say and discuss matters that need clarification. Where applicable, cash compensation amount and size of land offered for compensation will be presented to each eligible PAP for consideration and endorsement before cash payment or land compensation can be effected.

7.2 MONITORING AND EVALUATION PHASE

During RAP implementation PAPs representatives will participate in the project completion workshops (annual, mid-term and end term), to give their evaluation of the impacts of the project. They will also suggest corrective measures, which will be used to improve implementation of other sub-projects. After completion of all expropriation/compensation operations, the PAPs will be consulted in a household survey to be undertaken as a monitoring and evaluation exercise. More details of stakeholder engagement under SURP II, including consultation strategy and disclosure of information, are presented in the SEF. As an additional mitigation measure to complement external audit by the TPM the PCU also carries out RAP implementation audits to ensure compliance by each municipality.

7.3 SUMMARY OF STAKEHOLDER ENGAGEMENT ACTIVITIES

Preparation of the RPF third Update: (April-July 2025): The project is seeking a fourth additional financing thus necessitating this third update of the mother RPF. New public consultations were undertaken between April 24, 2024, and March 3-11, 2025, As well as June-July 2025, to update the project E&S frameworks (ESMF, RPF, SEF and LMP) and to prioritize investments under AF4. Consulted entities include Mayor of Hargeisa, the Municipality Directors for Public Works, Administration and Finance and directors of various departments under the Hargeisa Municipality. federal government officials; representatives of community groups including women, youth, and vulnerable groups such as IDPs and people with disability (PWD); clan elders and religious leaders, members of local and international non-governmental organizations (NGO); officials from UN agencies. Some of the approaches applied during the consultations included workshops and focus group discussions. More details on stakeholder engagement are captured in the SEF updated under AF 4 and annex 6 of this RPF.

7.4 ISSUES RAISED DURING RPF CONSULTATIONS

Issues Raised on the Third RPF Update (April-June, 2025)

1. Involuntary Resettlement and Compensation

- Potential displacement due to road widening or realignment, especially in densely populated areas.
- Eligibility, timelines, and the right to refuse relocation.
- Financial capacity of Hargeisa Municipality to provide adequate compensation, prompting calls for design alternatives—such as narrowing road carriageways—to reduce displacement impacts.
- Potential displacement linked to bridge construction of communities residing near the city’s seasonal stream.
- The need for timely, fair, and transparent compensation mechanisms prior to project commencement.
- The acceptability of voluntary land donation (VLD).
- Compensation of roadside vendors. The inclusion of informal vendors and micro-enterprises in the project’s compensation framework.
- Establishment and communication of the cut-off date.
- Civil works and utility management.

The following feedback was provided to the PAPs.

- The director of public works indicated the new administration has put measures in place to ensure that there is no forced eviction giving the example of resettlement conducted for households that were settled in a flood prone government owned land.
- The mayor is committed to paying compensation to any affected persons who are economically displaced. If there is a need for land acquisition, which is unlikely looking at the proposed investment, the government has the capacity to allocate such land.
- Clan elders indicated in case compensation is to be paid it would be crucial to ensure a clear and verifiable formula is followed. Any perception of clan favoritism would tarnish the project’s image.
- VLD is not currently accepted under SURP-II due to issues related to land ownership verification. It was pointed out. if considered in the future, VLD must strictly comply with World Bank requirements:
 - Landowners must be fully informed and consent in writing.
 - Donated land must be minor in size and must not impact livelihoods or require relocation.
 - Donations of communal land must be backed by community consensus and properly documented.

- Vendors eligible under the entitlement matrix will receive advance written notification prior to construction, allowing them to relocate with dignity and minimal loss.
- The RAP will incorporate verification procedures to ensure their entitlements are fulfilled.
- In alignment with World Bank policy, a publicly announced and widely disseminated cut-off date will precede implementation.
- Any individuals or vendors who settle or expand structures within the project area after the cut-off date will be ineligible for compensation.
- Early engagement with utility providers to avoid project delays caused by unresolved relocations, especially water pipelines.
- Ensuring utility adjustments are completed before contractor mobilization was highlighted as a lesson learned from previous cities.

8 GRIEVANCES MECHANISMS

8.1 GENERAL PRINCIPLES

The AF4 will maintain the existing grievance mechanism that addresses concerns of stakeholders promptly and effectively and in a transparent manner. It should be culturally appropriate and readily accessible to all project-affected parties, confidential, at no cost and without retribution. The mechanism will not prevent access to judicial or administrative remedies. The project-affected parties will be informed about the grievance process in the course of its community engagement activities. The summary of registered grievances and actions taken will be also made public. Handling grievances will be discreet, objective, sensitive and responsive to the needs and concerns of the project-affected parties. The mechanism will also allow for anonymous complaints to be raised and addressed. Individuals who submit their comments or grievances may request that their name be kept confidential.

8.2 GRIEVANCE CHANNELS

Any comments and grievances regarding AF4 can be submitted in person at the site, at the municipal headquarters or at the PIU offices. In addition, grievances can also be submitted through the different channels captured in **Table 11** below.

Table 11: Grievance Reporting Channels

City	Telephone number	Email
Hargeisa	3535/9779	www.hargeisamunicipality.gov.so

8.3 APPEAL PROCESS

SURP II AF4 will have the three-tier grievance systems in place at district, municipality, and federal levels, as illustrated in the below presented flow chart. The indicative members of each grievance committee are presented below. The aggrieved person has always the option to resort to the national judiciary system.

a. District/zone-level GM (Tier 1 GM)¹¹:

GRCs shall be established in Hargeisa for purposes of addressing grievances associated with AF4 interventions. These GRCs consist of representatives from the district's women and youth groups, people with disability, elders, religious leaders, representatives from the project affected persons, and the representatives of the municipality. The mechanism will take into consideration the existing traditional practices which would be the most logical form of justice for the majority of the PAPs. The district/zone-level GM will be attended by the contractor where relevant and supported by PIU and the engineering and supervision consultant as appropriate.

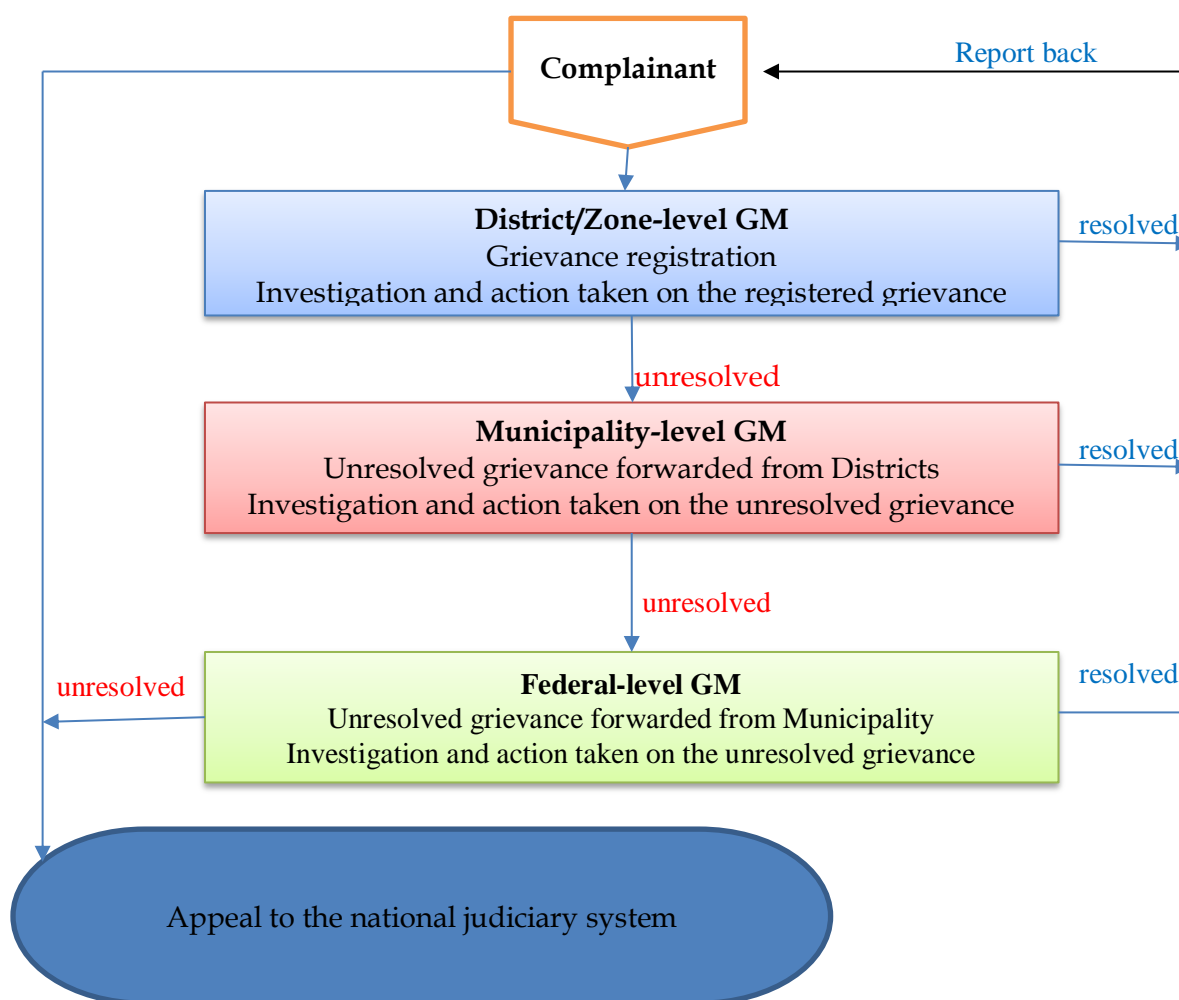
b. Municipality-level GM (Tier 2 GM):

¹¹ Depending on the administrative structure of the municipality, the Tier 1 GM may be established at municipality level and the Tier 2 GM at state-level.

The municipal-level GM will address un resolved grievances at the district/zone-level GM. The municipal-level GRC will be comprised of the representatives of each municipality, the PIU, the engineering and supervision consultant, and the representatives of the aggrieved persons/communities.

c. Federal-level GM (Tier 3 GM):

The existing federal-level GM will address unsolved grievances at the municipality level, which may require higher-level solution or common issues across municipalities participating in the project. The federal-level GRC consist the Project Coordination Unit (PCU) at the Ministry of Public Work, representatives of relevant municipalities, and other relevant federal ministries and agencies.



8.4 GRIEVANCE MANAGEMENT PROCESS

AF4- will aim to address grievances with the following steps and indicative timelines:

No	Steps to address the grievance	Indicative timeline*	Responsibility
1	Receive, register, and acknowledge complaint in writing.	Within one day	District GRC supported by PIU/engineering and supervision consultant.
2	Screen and establish the basis of the grievance; Where the complaint cannot be accepted (for example, complaints that are not related the project), the reason for the rejection should be clearly explained to the complainant.	Within three days	District GRC supported by PIU/engineering and supervision consultant.
3	GRC to consider ways to address the complaint.	Within three days	District GRC supported by PIU/engineering and supervision consultant.
4	Implement the case resolution or the unsatisfied complainant can seek redress with the appeal process.	Within three days	District GRC or Municipal GRC/Federal GRC in case of appeal.
5	Elevation of the case to a national judiciary system if complainant so wishes.	Any time	The complainant.

8.4 MANAGEMENT OF RESETTLEMENT RELATED GRIEVANCES

Typical grievances relevant to resettlement may include community or individual's dissatisfaction with: (a) the eligibility criteria, (b) the amount of compensation or assistance measures; (c) unexpected and unaddressed resettlement impacts; and (d) implementation or timing of such measures.

The overall process of grievance handling is as follows:

- Compensation committees including representatives of PAPs will establish the compensation rates.
- During the initial stages of the valuation process, the affected persons are given copies of grievance procedures as a guide on how to handle the grievances/sensitization of PAPs.
- The process of grievance redress will start with registration of the grievances to be addressed for reference, and to enable progress updates of the cases. See the updated SEF for grievance management form.
- The project will allow the use of a local mechanism, which includes peers and local leaders of the affected people. These will ensure equity across cases; they eliminate nuisance claims and satisfy legitimate claimants at low cost.
- The response time will depend on the issue to be addressed, but the indicative timeline will be provided.
- Compensation will be paid to individual PAPs only after a written consent of the PAPs is received, including both husband and wife (and children where relevant). Should a PAP decline the compensation suggested, he/she will have the option to register grievances to the grievance committee.

- g) A Compensation Committee (CC) and the grievance committee at the district level will first review his/her case.
- h) When these have failed to resolve the grievance, the individual PAP has the right to take his case to appeal the next level GM (municipality/state level or federal levels, depending on the municipality) or the civil courts for litigation.

9 MONITORING AND EVALUATION

The M&E approach adopted under the project has worked well. With the exception of the situation in Baidoa where forced evictions were undertaken by the Municipality in the vicinity of project activities, no significant RAP-related aspects have been registered in the other five cities.

During the implementation of the RAP, both an internal and an external resettlement Monitoring and Evaluation (M&E) will be carried out to ensure all PAPs are adequately compensated. A monitoring plan will be developed to assess whether the goals of the Hargeisa compensation plan are being met. The local government will facilitate coordination and collection of necessary M&E information through specific baseline and audit surveys carried out for Hargeisa Municipality while supervising documentation in accordance with set procedures. The internal resettlement monitoring will be carried out by the Project M&E Specialist. For external resettlement M&E, an independent Third - Party Monitoring contracted. Funds for external monitoring will be covered through Project budget. Financial records will be maintained by the Project Finance Specialist and the finance department of the local government. The following parameters and verifiable indicators will be used to measure compensation plans performance. Where applicable, these parameters/indicators will be disaggregated to measure the relevance to women and other vulnerable groups:

- Collection and storage of census data into a database for comparative analysis;
- Number of PAPs physically or economically displaced by each sub-project;
- Number of impacted residents employed by the project;
- Timing of compensation in relation to commencement of physical works;
- Compensation amount paid to each PAP;
- Number of people raising grievances and reached resolutions;
- All relevant items in the entitlement matrix will be monitored; and
- Consultations held.

Both internal and external monitoring reports will be used to assess whether any changes should be made to the implementation of the RAP. The sub-project team and the PIU should meet after each monitoring exercise to consult over M&E findings.

9.1 INTERNAL MONITORING

Internal monitoring will be conducted by the M&E Specialist member of the PIU to measure progress against milestones set in the RAP. The sub-project team will also be involved in conducting its own monitoring. The M&E Specialist will write monthly reports to monitor the impact of the Project. The following specific items will need to be monitored:

- PAP notification and holding adequate community consultation;
- Census of all PAPs and socio-economic survey have been carried out;
- RAP has been prepared, cleared, and disclosed;
- Compensation has been carried out in accordance with the RPF; and
- All grievances have been recorded and addressed.

9.2 EXTERNAL MONITORING/RAP AUDIT

The Bank contracted third party monitor will undertake regular audits and monitor to evaluate socio-economic conditions of the PAPs against the baseline data collected before RAP. This external independent monitoring, to be undertaken twice a year, will allow corrective actions to be carried out when/where it is necessary. The role of the external M&E will be defined in the ToRs to be approved by the World Bank. At a minimum these ToRs will include the following:

- Review and make recommendations on the gaps in RAP implementation;
- Track progress towards the completion of critical actions as defined in the RAP;
- Validate the internal monitoring data and make recommendations regarding internal monitoring;
- Track progress towards the completion of corrective actions arising from internal monitoring, and
- Complete and report on audits at defined intervals.

ANNEX 1: RAP OUTLINE ¹²

Resettlement plan

The scope of requirements and level of detail of the resettlement plan vary with the magnitude and complexity of resettlement. The plan is based on up-to-date and reliable information about (a) the proposed project and its potential impacts on the displaced persons and other adversely affected groups, (b) appropriate and feasible mitigation measures, and (c) the legal and institutional arrangements required for effective implementation of resettlement measures.

Minimum elements of a resettlement plan

1. **Description of the project.** General description of the project and identification of the project area.
2. **Potential impacts.** Identification of:
 - a. the project components or activities that give rise to displacement, explaining why the selected land must be acquired for use within the timeframe of the project;
 - b. the zone of impact of such components or activities;
 - c. the scope and scale of land acquisition and impacts on structures and other fixed assets;
 - d. any project-imposed restrictions on use of, or access to, land or natural resources;
 - e. alternatives considered to avoid or minimize displacement and why those were rejected; and
 - f. the mechanisms established to minimize displacement, to the extent possible, during project implementation.
3. **Objectives.** The main objectives of the resettlement program.
4. **Census survey and baseline socioeconomic studies.** The findings of a household-level census identifying and enumerating affected persons, and, with the involvement of affected persons, surveying land, structures, and other fixed assets to be affected by the project. The census survey also serves other essential functions:
 - a. identifying characteristics of displaced households, including a description of production systems, labor, and household organization; and baseline information on livelihoods (including, as relevant, production levels and income derived from both formal and informal economic activities) and standards of living (including health status) of the displaced population;

¹² Extracted from ESS 5 annex 1

- b. information on vulnerable groups or persons for whom special provisions may have to be made;
 - c. identifying public or community infrastructure, property or services that may be affected;
 - d. providing a basis for the design of, and budgeting for, the resettlement program;
 - e. in conjunction with establishment of a cutoff date, providing a basis for excluding ineligible people from compensation and resettlement assistance; and
 - f. establishing baseline conditions for monitoring and evaluation purposes. As the Bank may deem relevant, additional studies on the following subjects may be required to supplement or inform the census survey:
 - g. land tenure and transfer systems, including an inventory of common property natural resources from which people derive their livelihoods and sustenance, non-title-based usufruct systems (including fishing, grazing, or use of forest areas) governed by local recognized land allocation mechanisms, and any issues raised by different tenure systems in the project area;
 - h. the patterns of social interaction in the affected communities, including social networks and social support systems, and how they will be affected by the project; and
 - i. social and cultural characteristics of displaced communities, including a description of formal and informal institutions (e.g., community organizations, ritual groups, nongovernmental organizations (NGOs)) that may be relevant to the consultation strategy and to designing and implementing the resettlement activities.
5. **Legal framework.** The findings of an analysis of the legal framework, covering:
- a. the scope of the power of compulsory acquisition and imposition of land use restriction and the nature of compensation associated with it, in terms of both the valuation methodology and the timing of payment;
 - b. the applicable legal and administrative procedures, including a description of the remedies available to displaced persons in the judicial process and the normal timeframe for such procedures, and any available grievance mechanisms that may be relevant to the project;
 - c. laws and regulations relating to the agencies responsible for implementing resettlement activities; and
 - d. gaps, if any, between local laws and practices covering compulsory acquisition, imposition of land use restrictions and provision of resettlement measures and ESS5, and the mechanisms to bridge such gaps.
6. **Institutional framework.** The findings of an analysis of the institutional framework covering:
- a. the identification of agencies responsible for resettlement activities and NGOs/CSOs that may have a role in project implementation, including providing support for displaced persons;

- b. an assessment of the institutional capacity of such agencies and NGOs/CSOs; and
 - c. any steps that are proposed to enhance the institutional capacity of agencies and NGOs/CSOs responsible for resettlement implementation.
- 7. **Eligibility.** Definition of displaced persons and criteria for determining their eligibility for compensation and other resettlement assistance, including relevant cutoff dates.
- 8. **Valuation of and compensation for losses.** The methodology to be used in valuing losses to determine their replacement cost; and a description of the proposed types and levels of compensation for land, natural resources and other assets under local law and such supplementary measures as are necessary to achieve replacement cost for them.
- 9. **Community participation.** Involvement of displaced persons (including host communities, where relevant):
 - a. description of the strategy for consultation with, and participation of, displaced persons in the design and implementation of the resettlement activities;
 - b. a summary of the views expressed and how these views were taken into account in preparation for the resettlement plan;
 - c. a review of the resettlement alternatives presented, and the choices made by displaced person regarding options available to them; and
 - d. institutionalized arrangements by which displaced people can communicate their concerns to project authorities throughout planning and implementation, and measures to ensure that such vulnerable groups as indigenous people, ethnic minorities, the landless, and women are adequately represented.
- 10. **Implementation schedule.** An Implementation schedule providing anticipated dates for displacement, and estimated initiation and completion dates for all resettlement plan activities. The schedule should indicate how the resettlement activities are linked to the implementation of the overall project.
- 11. **Costs and budget.** Tables showing categorized cost estimates for all resettlement activities, including allowances for inflation, population growth, and other contingencies; timetables for expenditures; sources of funds; and arrangements for timely flow of funds, and funding for resettlement, if any, in areas outside the jurisdiction of the implementing agencies.
- 12. **Grievance mechanism.** The plan describes affordable and accessible procedures for third-party settlement of disputes arising from displacement or resettlement; such grievance mechanisms should take into account the availability of judicial recourse and community and traditional dispute settlement mechanisms.
- 13. **Monitoring and evaluation.** Arrangements for monitoring of displacement and resettlement activities by the implementing agency, supplemented by third-party monitors as considered appropriate by the Bank, to ensure complete and objective information; performance monitoring indicators to measure inputs, outputs, and outcomes for resettlement activities; involvement of the displaced persons in the monitoring process; evaluation of results for a reasonable period after all resettlement activities have been completed; using the results of resettlement monitoring to guide subsequent implementation.

14. **Arrangements for adaptive management.** The plan should include provisions for adapting resettlement implementation in response to unanticipated changes in project conditions, or unanticipated obstacles to achieving satisfactory resettlement outcomes. Additional planning requirements where resettlement involves physical displacement
15. When project circumstances require the physical relocation of residents (or businesses), resettlement plans require additional information and planning elements. Additional requirements include.
16. **Transitional assistance.** The plan describes assistance to be provided for relocation of household members and their possessions (or business equipment and inventory). The plan describes any additional assistance to be provided for households choosing cash compensation and securing their own replacement housing, including construction of new housing. If planned relocation sites (for residences or businesses) are not ready for occupancy at the time of physical displacement, the plan establishes a transitional allowance sufficient to meet temporary rental expenses and other costs until occupancy is available.
17. **Site selection, site preparation, and relocation.** When planned relocation sites are to be prepared, the resettlement plan describes the alternative relocation sites considered and explains sites selected, covering:
 - a. institutional and technical arrangements for identifying and preparing relocation sites, whether rural or urban, for which a combination of productive potential, locational advantages, and other factors is better or at least comparable to the advantages of the old site with an estimate of the time needed to acquire and transfer land and ancillary resources;
 - b. identification and consideration of opportunities to improve local living standards by supplemental investment (or through establishment of project benefit-sharing arrangements) in infrastructure, facilities or services;
 - c. any measures necessary to prevent land speculation or influx of ineligible persons at the selected sites;
 - d. procedures for physical relocation under the project, including timetables for site preparation and transfer; and
 - e. legal arrangements for regularizing tenure and transferring titles to those resettled, including provision of security of tenure for those previously lacking full legal rights to land or structures.
18. **Housing, infrastructure, and social services.** Plans to provide (or to finance local community provision of) housing, infrastructure (e.g., water supply, feeder roads), and social services (e.g., schools, health services); plans to maintain or provide a comparable level of services to host populations; any necessary site development, engineering, and architectural designs for these facilities.
19. **Environmental protection and management.** A description of the boundaries of the planned relocation sites; and an assessment of the environmental impacts of the proposed resettlement and measures to mitigate and manage these impacts (coordinated as appropriate with the environmental assessment of the main investment requiring the resettlement).

20. **Consultation on relocation arrangements.** The plan describes methods of consultation with physically displaced persons on their preferences regarding relocation alternatives available to them, including, as relevant, choices related to forms of compensation and transitional assistance, to relocating as individual households families or with pre-existing communities or kinship groups, to sustaining existing patterns of group organization, and for relocation of, or retaining access to, cultural property (e.g., places of worship, pilgrimage centers, cemeteries).
21. **Integration with host populations.** Measures to mitigate the impact of planned relocation sites on any host communities, including:
- a. consultations with host communities and local governments;
 - b. arrangements for prompt tendering of any payment due the hosts for land or other assets provided in support of planned relocation sites;
 - c. arrangements for identifying and addressing any conflict that may arise between those resettled and host communities; and
 - d. any measures necessary to augment services (e.g., education, water, health, and production services) in host communities to meet increased demands upon them, or to make them at least comparable to services available within planned relocation sites. Additional planning requirements where resettlement involves economic displacement.
22. If land acquisition or restrictions on use of, or access to, land or natural resources may cause significant economic displacement, arrangements to provide displaced persons with sufficient opportunity to improve, or at least restore, their livelihoods are also incorporated into the resettlement plan, or into a separate livelihoods improvement plan. These include:
23. **Direct land replacement.** For those with agricultural livelihoods, the resettlement plan provides for an option to receive replacement land of equivalent productive value or demonstrates that sufficient land of equivalent value is unavailable. Where replacement land is available, the plan describes methods and timing for its allocation to displaced persons.
24. **Loss of access to land or resources.** For those whose livelihood is affected by loss of land or resource use or access, including common property resources, the resettlement plan describes means to obtain substitutes or alternative resources, or otherwise provides support for alternative livelihoods.
25. **Support for alternative livelihoods.** For all other categories of economically displaced persons, the resettlement plan describes feasible arrangements for obtaining employment or for establishing a business, including provision of relevant supplemental assistance including skills training, credit, licenses or permits, or specialized equipment. As warranted, livelihood planning provides special assistance to women, minorities or vulnerable groups who may be disadvantaged in securing alternative livelihoods.
26. **Consideration of economic development opportunities.** The resettlement plan identifies and assesses any feasible opportunities to promote improved livelihoods as a result of resettlement processes. This may include, for example, preferential project employment arrangements, support for development of specialized products or

markets, preferential commercial zoning and trading arrangements, or other measures. Where relevant, the plan should also assess the feasibility of prospects for financial distributions to communities, or directly to displaced persons, through establishment of project- based benefit-sharing arrangements.

27. Transitional support. The resettlement plan provides transitional support to those whose livelihoods will be disrupted. This may include payment for lost crops and lost natural resources, payment of lost profits for businesses, or payment of lost wages for employees affected by business relocation. The plan provides that the transitional support continues for the duration of the transition period.

28. Economic Displacement. Where land acquisition or restrictions on the use of, or access to, land or natural resources may cause significant economic displacement, arrangements to provide displaced persons with sufficient opportunities to improve, or at least restore, their livelihoods are also incorporated into the resettlement plan or into separate livelihoods improvement plan.

- For those with agricultural livelihoods, the resettlement plan provides an option to receive replacement land of equivalent productive value or demonstrates that sufficient land of equivalent value is available. Where replacement land is available, the plan describes methods and timing for allocating to displaced persons.
- For those whose livelihood is affected by the loss of land or resource use or access, including common property resources, the resettlement plan describes means to obtain substitutes or alternative resources or otherwise provides support for alternative livelihoods.
- For all other categories of economically displaced persons, the resettlement plan describes feasible arrangements for obtaining employment or establishing a business, including providing relevant supplemental assistance, skills training, credit, licenses or permits, or specialized equipment. Further, as warranted, livelihood planning provides special assistance to women, minorities, or vulnerable groups who may be disadvantaged in securing alternative livelihoods.
- The resettlement plan identifies and assesses any feasible opportunities to promote improved livelihoods as a result of the resettlement processes. For example, preferential project employment arrangements, support for the development of specialized products or markets, preferential commercial zoning and trading arrangements, or other measures. Where relevant, the plan needs to also assess the feasibility of prospects for financial distributions to communities or directly to displaced persons by establishing project-based benefit-sharing arrangements.
- The resettlement plan provides transitional support to those whose livelihoods will be disrupted. For example, payment for lost crops and lost natural resources, payment of lost profits for businesses, or payment of lost wages for employees affected by business relocation. The plan provides that the transitional support continues for the duration of the transition period.

ANNEX 2: SAMPLE OF LAND ASSET AND PHYSICAL INVENTORY CENSUS SURVEY FORM

Socio-Economic Household Datasheet of PAPs

Interviewer		Signature
Supervisor		(After verification)
Name		
Position of concession in coordinates		
Day / Month / Year		
1) Head of Extended Family		
2) No. of nuclei families in extended family residential group		
3) Head of household extended family		

a) Household Interview

Relationship to Head of family	Sex		Place of Birth	Age	M	Marital status	Residence tenure	Ethnic group	Religion	Education level	Income earner		Economic rating		
	M	F									Yes	No	Primary	Secondary	Tertiary

Head of Family/Household (HOH): 1. Head of household; 2. Spouse of HOH; 3. Child of HOH; 4. Grandchild of HOH; Parent of HOH; No answer

Marital status: 1. Married; 2. Widowed; 3. Divorced; 4. Single; 5. No answer

Residence tenure: 1. Permanent residence; 2. Resident absent; 3. Member of non-resident; 4. Visitor; 5. other (specify); 6. No answer

Educational level: 1. No formal education; 2. Primary; 3. Secondary; 4. Youth polytechnic; 5. Religious school; 6. College; 7. university

ANNEX 3: SAMPLE ASSET VALUATION SURVEY FORM

Household ID of Asset Inventory for Project Affected People

Date_____

HH ID	No. of persons in the HH	Vulnerability	Total landholding of HH (m²)	Land to be acquired (m²)	Land ¹³ use type	Loss of % total	Loss of assets			Loss of crops			Loss of other assets	Other losses			Loss of income
							Permanent structures (m²)	Temporary structures (m²)	Area of residence land lost (m²)	Fruit trees lost (type and number)	Agric. Land lost (m²)	Other (specify)	e.g., graveyard; wells, etc. (type and number)	Rented residence	Bush lost	Etc. (specify)	

Entitlements of PAPs

HH ID	Compensation for land			Compensation for structures		Compensation for crops and trees			Compensation for other assets and losses (e.g., Graveyards, wells, businesses, etc.)		
	Quantity (m²)	Unit price per m²	Entitlement USD	Unit price (USD per m²)	Entitlement (USD)	Quantity unit	Unit price USD)	Entitlement (USD s)	Quantity unit	Unit price (USD)	Entitlement USD)

¹³Please fill in the type of land: 1. Communal; 2. Privately titled; 3. Public land; 4. Gazetted land; 5. Ranching/Group land; 6. Other (specify)

ANNEX 4: SAMPLE SOCIO-ECONOMIC INDICATORS TO BE CONSIDERED FOR SURP_II AND THE AF IMPACT

Indicator	Target
HEALTH	
Incidence of poor health	Good health rate
Rate of contracted diseases especially malaria	Disease prevention especially malaria and HIV/AIDS
Infant mortality rate	Prevention of infant deaths
Water borne diseases	Non incidence of water borne disease
SAFETY	
Accident rate	Non increase in accidents due to project interventions
EDUCATION LEVEL	
Literacy rates	Increase in basic literacy rates of population targeted by intervention
Enrolment at school (primary, secondary, tertiary)	Increased rates of enrolment of both boys and girls at all schooling levels, to average international rates for those targeted by intervention
Number of school leavers	Reducing the number of school leavers to average international levels
INCOME LEVELS/WEALTH	
Levels of poverty	Elimination of poverty
Total HH income	Increase in HH income to levels that exceed expenditure and ensure livelihood security
Total HH expenditure	No change or decrease in average expenditure
POPULATION DYNAMICS	
Levels of inward migration	Manageable levels of inward migration according to carrying capacity (in terms of population, employment opportunities and land availability) of affected area
Levels of outward migration	Reduce the need for forced outward migration
Level of outward migration of young people (age 16-25)	Reduce the need for forced outward migration of young people (age 16-20)
RAP Specific Data	
Number of affected persons fully compensated disaggregated by gender and asset type;	Ensure full, just and prompt compensation to affected persons.
Number of vulnerable affected persons assisted by type and gender; Type of assistance provided to vulnerable affected persons;	Ensure full, just and prompt compensation and assistance to vulnerable affected persons.

Annex 5: Sample Resettlement Action Plan



Combined SURP II
Garowe RAP Sept 24 ;

ANNEX 6: SUMMARY OF AF4 CONSULTATIONS CONDUCTED IN HARGEISA

Introduction

The Nagaad Project is expected to expand to Hargeisa, the capital city of Somaliland under a fourth Additional Finance (AF 4) for the Project. Consultations commenced in Nairobi where the PCU had its first consultation on 24 April 2024 with the Mayor of Hargeisa, and the Directors for Public Works, and Admin and Finance. During this consultation, in addition to introducing the expected AF4, the World Bank's ESF was elaborated, the ESCP was explained and the need to update the SEF, ESMF, RPF, and LMP was described. A stakeholder mapping was carried out to identify stakeholders to be consulted in Hargeisa, in accordance with the Project's SEF, from March 3, 2025, to March 11, 2025, as well as in April and June 2025. The following stakeholders were identified: Hargeisa Local Government Directors, sub-district government officials and representatives from women and youth organizations, elders, religious leaders, vulnerable community members (PWDs, and IDPs), community-based organizations and their umbrella. During these consultations the stakeholders were to be informed of the World Bank ESF, Nagaad Project, and potential project activities.

Institutional Arrangements and Legal Framework

On March 3, 2025, Directors from 10 Departments were consulted. The directors provided the PCU with information on how the Hargeisa Local Government was structured, its roles and responsibilities, development projects in the city funded by the local government and donors, and achievements over the last three years. The provided information indicated:

- Hargeisa is the capital and largest city of Somaliland which self-declared independent 1991 and aspires to be recognised a country and a member of the United Nations.
- City has an estimated population 1.5 million based on housing registration.
- The constitution of the republic of Somaliland provides a foundational legal framework that indirectly influences urban infrastructure development through various provisions.
- Environmental considerations in urban infrastructure projects are emphasized in **article 18**, which mandates the state to protect the environment and manage natural resources responsibly.
- The legal and regulatory framework for urban infrastructure in Somaliland establishes clear mandates for municipal governments, national ministries, and agencies.
- The Local Government Law (Law No. 23/2002) grants municipal councils authority over urban planning and public services, including roads and drainage systems.
- The Urban Land Management Law (Law No. 17/2001) regulates land use and grants municipalities oversight of urban expansion and zoning for infrastructure projects.
- The Somaliland Roads Act (Law No. 55/2012) classifies roads and assigns maintenance duties, with local governments responsible for municipal roads while national roads fall under the Somaliland Road Development Authority (SRDA).
- Key achievements included: self-funded construction/rehabilitation of 100 kms of urban roads in the city, city wide clean-up campaign that has changed citizen behaviour and has cleaned up the city's mainstream used as an illegal dumpsite.
- Hargeisa is the capital and largest city of Somaliland which self-declared independent 1991 and aspires to be recognised a country and a member of the United Nations.
- City has an estimated population 1.5 million based on housing registration.
- The constitution of the republic of Somaliland provides a foundational legal framework that indirectly influences urban infrastructure development through various provisions.
- As the capital of Somaliland, Hargeisa serves as the region's political and administrative hub. The city's governance is overseen by a District Council comprising 17 elected members responsible for municipal administration and policymaking. The council elects a

mayor from among its members to lead the city. As of June 2021, Abdikarim Ahmed Mooge holds this position.

- Hargeisa is managed by the Hargeisa Local Government, which oversees urban planning, infrastructure development, and public services. The city is divided into nine administrative sub-districts, each with its own local governance structure. These sub-districts are further subdivided into multiple neighbourhoods.
- Environmental considerations in urban infrastructure projects are emphasized in **article 18**, which mandates the state to protect the environment and manage natural resources responsibly.
- The legal and regulatory framework for urban infrastructure in Somaliland establishes clear mandates for municipal governments, national ministries, and agencies.
- The Local Government Law (Law No. 23/2002) grants municipal councils authority over urban planning and public services, including roads and drainage systems.
- The Urban Land Management Law (Law No. 17/2001) regulates land use and grants municipalities oversight of urban expansion and zoning for infrastructure projects.
- The Somaliland Roads Act (Law No. 55/2012) classifies roads and assigns maintenance duties, with local governments responsible for municipal roads while national roads fall under the Somaliland Road Development Authority (SRDA).
- The Hargeisa Local Government has adopted the use of cloud-based accounting system (Financial Management Information System.). The city's annual budget average has been USD 19 million over the last 3 years.
- Hargeisa Local Government has developed a MIS system to manage local government operations including tracking customer service (also covers grievances).
- Hargeisa Local Government has developed a MIS system to manage local government operations including tracking customer service (also covers grievances).
- The HGL has a Social Affairs Department which is also responsible for environmental management.
- Among the city's income sources is a rehabilitated water-retention pond that is used to supply water for the construction industry.
- Several key state government institutions in Somaliland are involved in infrastructure development including the **Ministry of Environment and Climate Change (MoECC)** which addresses urban environmental issues, including waste management, pollution control, and green space development.
- The city has an established property register that provides disaggregated data including whether the land is built or vacant, ownership (public or private), and type of structure.

Social Cultural Aspects to Be Considered in Planning for Investments

- The city has a significant IDP population the city's periphery.
- There is a minority clan (Gabooye) that will require special considerations.
- Hargeisa is a peaceful city but has clear clan divisions which provides a sense of identity and belonging but also contributes to political challenges and heated debates when it comes to resource allocation.

Infrastructure Related Challenges Facing the City

- Hargeisa faces persistent infrastructural challenges that significantly impact the daily lives of its residents.
- Water supply and sanitation services remain inadequate, resulting in frequent shortages and reliance on water trucking in many neighbourhoods.
- Electricity supply is unreliable, forcing many households and businesses to depend on private generators due to inconsistent access to power.

- One of the major concerns in Hargeisa is the poor drainage system, which leads to frequent flooding during the rainy season.
- Inadequate drainage infrastructure causes water stagnation, damaging roads, increasing the risk of waterborne diseases, and disrupting daily activities.
- Waste management is a pressing issue although significant clean-up campaigns have occurred, and the city is now clean.
- The road network in the periphery sub-districts is in poor condition, with rough and unpaved roads creating significant mobility challenges. These conditions have particularly severe consequences for pregnant women, the elderly, and individuals with health conditions who struggle with transportation due to the bumpy and uneven roads.
- The frequent breakdown of vehicles due to poor road conditions further exacerbates transportation difficulties, leading to costly repairs, increased travel time, and higher transportation expenses for residents.
- Many residents, including internally displaced persons (IDPs), must travel long distances from their homes to reach bus stops, markets, and essential services. This poses a particular burden on school children, elderly individuals, and pregnant women, who are often forced to walk long distances due to the lack of accessible public transport. The absence of well-planned transportation routes makes daily commuting more difficult, further straining vulnerable populations.

Project Background and Design

- Government officials expressed they were unfairly left out of preceding urban development projects especially the SUIPP whose planned implementation included Hargeisa, but it was dropped.
- Available budget for infrastructure investments would be about USD 16,000,000.
- The project was implemented by municipalities.

Outcome of the consultation held with community members

The section below summarizes some of the key discussion points from the consultations held with stakeholders including women and youth organizations, elders, religious leaders, vulnerable community members (PWDs and IDPs), community-based organizations and their umbrella organizations. 12 consultations were held in Hargeisa city.

Job Opportunities

- Community members indicated they expected to be provided with jobs during construction.

Gender

- Some of the elders and religious leaders indicated it was culturally inappropriate to have women work in road construction.
- Some of the women indicated they would not doing minor work such as making food for the workers and workers.
- The elders and religious leaders it was ok for trained women engineers to work in construction.

Security Concerns

- All participants indicated Hargeisa was a peaceful city and project work would not be disrupted. They pointed out that foreign workers could freely walk about in the city.

Gender Based Violence

- High risk for IDPs who live in the city peripheries where there is no lighting.

- Case of attempted rape of a woman IDP by a public bus driver was mentioned. Case currently in Court.

Involuntary Resettlement and Compensation

- Roads were cleared of structures without compensation around four years ago.
- The current local government has allocated land to IDPs displaced from the central business district. Urban poor moved away from a flood prone area next to a storm water retention pond also provided with land by the municipality.
- Widespread concern was expressed regarding potential displacement due to road widening or realignment, especially in densely populated areas.
- Eligibility, timelines, and the right to refuse relocation.
- Financial capacity of Hargeisa Municipality to provide adequate compensation, prompting calls for design alternatives—such as narrowing road carriageways—to reduce displacement impacts.
- Potential displacement linked to bridge construction of communities residing near the city's seasonal stream.
- The need for timely, fair, and transparent compensation mechanisms prior to project commencement.
- Clan elders indicated in case compensation is to be paid it would be crucial to ensure a clear and verifiable formula is followed. Any perception of clan favoritism would tarnish the project's image.
- The acceptability of voluntary land donation.
- Establishment and communication of Cut-Off Date.
- Compensation for roadside vendors.
- Civil works and utility coordination.
- Demand for Resilient and Inclusive Infrastructure
 - Community members stressed the need for climate-resilient infrastructure, including reinforced bridges and culverts, to reduce vulnerability during the rainy season.
 - Appreciation was expressed for livelihood compensation practices under SURP II, particularly those addressing temporary displacement of vendors—an approach recognized as socially responsive.

The following feedback was provided to the PAPs.

- The director of public works indicated the new administration has put measures in place to ensure that there is no forced eviction giving the example of resettlement conducted for households that were settled in a flood prone government owned land.
- The mayor is committed to paying compensation to any affected persons who are economically displaced. If there is a need for land acquisition, which is unlikely looking at the proposed investment, the government has the capacity to allocate such land.
- The inclusion of informal vendors and micro-enterprises in the project's compensation framework.
- Vendors eligible under the entitlement matrix will receive advance written notification prior to construction, allowing them to relocate with dignity and minimal loss.
- The RAP will incorporate verification procedures to ensure their entitlements are fulfilled.

- It was clarified that VLD is not currently accepted under SURP-II due to issues related to land ownership verification. It was pointed out, if considered in the future, VLD must strictly comply with World Bank requirements:
 - Landowners must be fully informed and consent in writing.
 - Donated land must be minor in size and must not impact livelihoods or require relocation.
 - Donations of communal land must be backed by community consensus and properly documented.
- In alignment with World Bank policy, a publicly announced and widely disseminated cut-off date will precede implementation.
- Any individuals or vendors who settle or expand structures within the project area after the cut-off date will be ineligible for compensation.
- Early engagement with utility providers was emphasized as critical to avoid project delays caused by unresolved relocations, especially water pipelines.

Ensuring utility adjustments are completed before contractor mobilization was highlighted as a lesson learned from previous cities.

Stakeholder Engagement and Grievance Management

- Community members from the sub-districts indicated they were happy to be consulted and hoped their input would be taken into consideration.
- Some members of the civil society indicated the municipality needed to improve its engagement with the civil society. Stakeholders welcomed the establishment of GM but stressed the importance of continued awareness campaigns to ensure accessibility, especially for women, IDPs, and persons with disabilities.

Ongoing Roads Infrastructure Investments Project

- Over the past three years the Hargeisa Local Government has constructed or rehabilitated **103.35 km** of urban roads across its nine districts using its own funds. These roads were selected using the following main criteria: cost, inclusivity (clan sensitivities are very high), and connectivity.
- The government of Taiwan is co-funding the construction of a 3 km road that has a side drainage and solar streetlight.

Potential Investments

a. Government officials indicated:

- As urbanization accelerates, major investments in infrastructure—particularly in transportation, water management, drainage systems, and public utilities—are required.
- Flash floods remain a persistent threat during the rainy seasons due to Hargeisa's inadequate drainage system. Heavy rainfall leads to water overflow onto roads and into residential areas, causing severe disruptions and economic losses.
- The impact of these floods is most severe in low-lying areas, informal settlements, and internally displaced persons (IDPs) camps, where inadequate housing structures and poor drainage make residents particularly vulnerable. These floods have led to loss of lives, destruction of homes, and damage to businesses, leaving many families financially unstable and displaced.
- During flash floods, damaged roads and blocked access prevent water trucks from reaching affected areas, worsening the crisis for residents who already struggle with limited access to clean water.
- Urban planning challenges also exacerbate disaster risks. Hargeisa's rapid and unregulated expansion has led to poorly planned informal settlements, which are highly vulnerable to fires, infrastructure failures, and flooding.

b. Members of community-based organizations indicated:

- Connectivity between the different areas of the city should be a big priority.
- IDPs living in the city outskirts should not be forgotten.

c. Community members from the districts indicated:

- Drainage was of high priority.
- The inner ring road is of high importance as it connects several districts.
- Each district provided a list of all their infrastructure needs.

Priority Investments

Captured below is a summary of the proposed priority investments, their description, estimated cost, and the justification provided by the government, local community and civil society for their selection. The criteria taken into consideration during the prioritization process include potential AF 4 funding, local government plans, clan inclusivity, connectivity, and access provision to service centres and access to the city for IDPs who live in the outskirts of the city.

1) Maxamuud Haybe sub-district					
	Road Name	District	Length	Estimated Cost (USD)	Justification provided by the community, civil society and the local government
1	Al-Huda Road with 2 Culverts	M/Haibe	1.9 Km	1,090,000	Connects four districts including market, schools and main hospital. The poor road conditions in this neighbourhood severely impact residents, making it difficult for water trucks, public transportation, and emergency vehicles to access the area. As a result, water prices are high, pregnant women face risks during labour, and movement becomes impossible during the rainy season, leaving people without access to essential resources like water and markets.
2	Sayladda - Future road with 1 Culvert	M/Haibe	1.2 Km	590,000 USD	This road and culvert will be rehabilitated to improve connectivity to the animal market and reduce the risk of flash floods caused by the dry river. 900m of the road has already been constructed by Hargeisa local municipality. This road also connects to other districts and provides essential access to the animal market, where many urban poor and IDPs rely on their daily livelihoods. During the rainy season, the market is forced to close due to poor accessibility.
	Xaarwada/Bootaan Culvert	M/Haibe	Two cell culverts	90,000 USD	Improves connectivity to two communities as well as access to market, education, and health facilities. Improving access to both sides of the dry river during flash floods is crucial, especially as one side is home to an IDP settlement. Last year, a fire broke out in the IDP camp, firefighters were unable to cross the river. They had to take an alternative route, which took nearly two hours instead of the usual five minutes, by which time the fire had completely destroyed everything.
2) Maxamed Mooge sub-district					
BOX CULVERTS/BRIGES STANDS ALONE					
	Culverts/Bridges	District	Dimension	Construction Cost	Justification provided by the community, civil society and the local government
1	Shiraaqle Bridge	M/Moge		2,000,000 USD	This bridge is a priority for two districts, Mohamed Mooge and Macalin Haruun, as it will enhance connectivity between them.

	Road Name	District	Length	Estimated Cost (USD)	Justification provided by the community, civil society and the local government
					<p>Additionally, it will link these districts to the central district, improving access to essential services such as businesses, healthcare, and education.</p> <p>This bridge is a major concern for the community, as it has caused the loss of many lives and significant economic hardship. Every year, numerous people lose their loved ones due to flash floods. Additionally, this bridge is the only route for nearly 30,000 IDPs, urban poor and minority living in Macalin Harun and Mohamed Mooge districts.</p> <p>Recognizing the urgency of the situation, the communities from both districts came together and initiated a fundraising effort to find a solution. They formed a committee that included business leaders and engineers, who conducted feasibility, geotechnical, and hydrological studies, along with a detailed design plan. However, despite their efforts, the community lacks full financial capacity to fund the bridge's construction.</p>
2.	Golbarwaaqo of road	M/Moge	3.5KM	1,040.000USD	2 km will be financed by AF4, while the remaining 1.5 km will be covered by municipal funds.
3	Kaafi Culverts	M/Moge	Two Cell Culverts	90,000 USD	<p>This culvert provides access to the primary school in the neighbourhood, making it essential for students and the community.</p> <p>This culvert will significantly improve access and enhance safety, especially for children. During the rainy season, movement becomes impossible, and children have lost their lives while attempting to cross the river. Additionally, when the rain begins, schools are forced to close, disrupting children's education.</p>
4	Boodhari/Dalsan Culverts	M/Moge	Two Cell Culverts	90,000 USD	This culvert is the only access route to the primary school in the neighbourhood, making it crucial for both students and the wider community. Its improvement will enhance safety and ensure uninterrupted access to education.
3) Macalin Haaruun District					

	Road Name	District	Length	Estimated Cost (USD)	Justification provided by the community, civil society and the local government
	Road Name	District	Dimension	Construction Cost	Justification provided by the community, civil society and the local government
1	Waddada Cabdi BidaaR with 1 Culvert-IDP	M/Harun	1.8 Km	900,000	<p>This road is a continuation of the Hodan Hills roads, initially constructed by the municipality to serve IDPs, and will further enhance connectivity. Additionally, it will link to Shiraaqle Bridge, improving access for the community as well as labour boqol road.</p> <p>This road provides vital access to the Abdibidaar IDP settlement, where displaced families originally moved from the Daami water catchment (land and livelihood assistance provided). Residents face significant risks, including incidents of violence such as rape, particularly at night, due to the lack of public transportation caused by the poor road conditions. Additionally, water trucks struggle to reach the settlement, exacerbating water shortages.</p> <p>Upgrading this road will improve transportation, street lighting, and access for water trucks, ensuring safer mobility and a more reliable water supply. Furthermore, better connectivity to markets will strengthen local businesses, while increased employment opportunities will help uplift vulnerable communities, enhancing their overall quality of life.</p>
4) Koodbuur District					
	Road Name	District	Dimension	Construction Cost	Justification provided by the community, civil society and the local government

	Road Name	District	Length	Estimated Cost (USD)	Justification provided by the community, civil society and the local government
1	Boqol Iyo Konton Road	M/Koodbur	4.51 Km	3,157,000	<p>The rehabilitation of this road is a top priority for three districts, as it plays a vital role in connecting communities and enhancing accessibility. Each district has identified Boqol Iyo Konton road for improvement, with varying lengths based on the section that traverses through their sub-district. Breakdown of length per district is as follows: 4.51 km in Koodbuur, 1.6 km in Gacan Libaax, and 1.85 km on 26 June, bringing the total road length to 7.96 km. This project will significantly improve transportation, facilitate economic activities, and enhance overall mobility across the districts.</p> <p>This road also links to two other districts: Gacmo Dheere, and Macalin Haruun, linking them to markets, schools, and healthcare facilities. It is also the main route for public transport and water delivery, especially for IDP communities in Gacmo Dheere and Macalin Haruun sub-districts</p> <p>During heavy rains and flash floods, the road becomes impassable, cutting off access to essential services. This poses serious challenges, particularly for pregnant women, people with disabilities, and those needing urgent medical care, as alternative transport is expensive and difficult to find.</p>
5) Gacma Dheere sub-district					
	Road Name	District	Dimension	Construction Cost	Justification provided by the community, civil society and the local government
1	Waddada Sacaadadiin Boqol Jire	G/Dheere	2.5 Km	625,000	<p>Connects Boqol jire bridge also connects to Berbera Road. Rehabilitating this road will improve access between Boqol Jire Bridge and the city, benefiting Hargeisa's newest district, home to 5,000 IDP and Slum families in State house road (slum area), Magaalo Cas, Biixi and Malawle.</p>

	Road Name	District	Length	Estimated Cost (USD)	Justification provided by the community, civil society and the local government
					<p>Since the district is in a low-lying valley, it floods easily, blocking the only road to markets and essential services. When it rains, people must take a three-hour detour to reach the city. Transport costs are very high, with bus fares at \$1, taxis at \$10 one way, and water trucks either too expensive or unavailable.</p> <p>The district also has a large animal market, which many rely on for income. It connects Hargeisa with other cities such as Barbara, but during heavy rains, it completely shuts down, leading to a meat shortage across the city.</p>
BOX CULVERTS/BRIGES					
	Culverts/Bridges		Road Name	Construction Cost	Notes
1	Boqol Jire Bridge	G/Dheere		1,000,000 USD	This is the only bridge and route connecting the district to 31 May and Gacmo Dheere sub-districts as well the rest of Hargeisa, making it a critical link for transportation and access to essential services. This bridge is a vital connection for the sub-district, linking the community to other districts, essential services, and livelihood opportunities. However, during the rainy season, the entire community is cut off, making movement impossible.
6) Gacan Libaax sub-district					
	Road Name	District	Length	Construction Cost	Notes
1	Boqol iyo konton	G/Libaax	1.6 Km	1,280,000	
	Daami Retention Pond				This water catchment was previously home to the Gabooye (ethnic minority community) where many lives were lost during floods each rainy season To address this, the local government of Hargeisa provided land and relocated 140 families to the Abdibidaar IDP site, where they were also given livelihood

	Road Name	District	Length	Estimated Cost (USD)	Justification provided by the community, civil society and the local government
					<p>support, including motorcycles and business income opportunities.</p> <p>The municipality closed the catchment area, and during the rainy season, water is retained and repurposed for construction and agriculture. This initiative also generates municipal revenue by selling the stored water for sustainable use, serving as a nature-based solution to water management.</p> <p>However, the water catchment needs further improvements and construction to enhance its efficiency and safety. Currently, it has wire mesh fencing to minimize drowning risks for children and the community, but additional upgrades are required for long-term sustainability. Ideal for including Nature Bases Solutions.</p>
7) 31 May sub-district					
	Road Name	District	Length (KM)	Construction Cost	Notes
1	Waddada Jaamacada Hargeysa	31ka May	0.7	USD 350,000	
	Faluuja		1.45	942,000	<p>This road connects to the IDP settlements of Qandahar, Sancaani, and Faluuja to City facilities such as markets and bus station, while also providing access to the Masalaha Cemetery, making it a vital route for the community. This road is essential as it facilitates access for IDPs to the city. The IDP settlements benefiting from this road include Qandahaar, Sancaani, and Faluuja, home to a total of 7,000 households. Additionally, it provides access to the local cemetery, which residents currently struggle to reach. High transportation costs further exacerbate</p>

	Road Name	District	Length	Estimated Cost (USD)	Justification provided by the community, civil society and the local government
					these challenges. Improving this road is crucial for enhancing livelihoods, easing mobility, and ensuring better access to essential services such as education, healthcare, and clean water.
BOX CULVERTS/BRIGES					
	Culverts/Bridges	Road Name	Construction Cost	Note	
1	Boqol jire Bridge	31ka May	1,000,000 USD	This is the only bridge and route connecting this sub-district district to 31 May and Gacmo Dheere sub-districts as well the rest of Hargeisa, making it a critical link for transportation and access to essential services. During the rainy season, the entire community is cut off, making movement impossible.	
8) 26 June sub-district					
	Road Name	District	Dimension	Construction Cost	Justification provided by the community, civil society and the local government
1	Boqol Iyo Konton Road	26 June	1.85 Km	1,480,000 USD	Covered above.
BOX CULVERTS/BRIGES STANDS ALONE					
	Culverts/Bridges	District	Road Name	Construction Cost	Justification provided by the community, civil society and the local government
1	Ganbo-Cune	26 June		280,000 USD	This box culvert enhances road connectivity, minimizes flood risks, and improves community access, ensuring safer and more reliable transportation for residents. This box culverts will alleviate flooding that reaches residential areas. Additionally, the flooding disrupts the city center and affects public transportation, hindering mobility and daily activities.

9) Axmed Dhagax sub-district					
	Road Name	District	Dimension	Construction Cost	Justification provided by the community, civil society and the local government
1	Waddada geele arab ilaa ina naxar Road	A/Dhagax	2.16km	1,080,000 USD	This road serves as a crucial link for internally displaced persons (IDPs) residing along 150 Road, improving their access to essential services and economic opportunities. It also connects two key sub-districts, Mohamoud Haibe and Ahmed Dhagax, whose roads have already been rehabilitated by the Hargeisa local government. Enhancing this road will further strengthen the city's transportation network, facilitate smoother movement for residents, and promote economic and social development in the area. Additionally, it will help reduce travel time, lower transportation costs, and improve access to healthcare, education, and markets for the affected communities.
	Qalax IDP-Gravel Road				This box culvert plays a vital role in enhancing road connectivity, reducing flood risks, and improving overall accessibility for the IDP community in Qalax. By effectively managing water flow during heavy rains, it will help prevent flooding and road damage, ensuring safer and more reliable transportation for residents. Additionally, it supports economic activities by enabling smoother movement of people and goods, ultimately contributing to the community's long-term resilience and development.
	Faadumo Biixi Culvert			90,000	This box culvert enhances road connectivity, reduces flood risks, and improves access for internally IDPs in the Faduma Bixi settlement and Primary school. By effectively managing water flow during heavy rains, it helps prevent flooding and road damage, ensuring safer and more reliable transportation for residents. Additionally, it facilitates better

					access to essential services such as education, healthcare, and markets, ultimately contributing to the well-being and stability of the community.
BOX CULVERTS/BRIGES STANDS ALONE					
	Culverts/Bridges		Road Name	Construction Cost	Justification provided by the community, civil society and the local government
1	Tayo maal Culvert	A/Dhagax		90,000 USD	This box culvert will enhance road connectivity, minimize flood risks, and improve community access, ensuring safer and more reliable transportation for the community. The district is situated in a low-lying valley, where large volumes of water flow through during heavy rains. The construction of box culverts will help minimize flood risks, prevent water accumulation, and improve accessibility for the community, ensuring safer and more efficient movement for residents.
	Boosha cadde Culvert	A/Dhagax		90,000 USD	The road has been rehabilitated, and this box culvert will enhance road connectivity, reduce flood risks, and improve community access, ensuring safer and more efficient transportation for residents. The district is situated in a low-lying valley, where large volumes of water flow through during heavy rains. The construction of box culverts will help minimize flood risks, prevent water accumulation, and improve accessibility for the community, ensuring safer and more efficient movement for residents.

ANNEX 7: INDICATIVE SCREENING CHECKLIST FOR LAND AND RESETTLEMENT IMPACTS

1. Sub-project Overview

- Brief description of the sub-project.
- Location and size of the area affected.

2. Land Acquisition Details

- Types of land affected (public, private, communal).
 - Current land use and ownership status.
- Amount of land required for the sub-project.

3. Impacts on Households, Businesses and Institutions

- Number of households/businesses and institutions affected.
 - Types of impacts (economic, access restrictions to communal properties and natural resources).
- Availability and adequacy of compensation plans.

4. Vulnerable Groups

- Identification of vulnerable populations (e.g., women, elderly, ethnic minorities, IDPs etc.,).
- Analysis of potential disproportionate impacts.

5. Community Resources

- Assessment of economic activities affected (e.g., businesses).

- Availability of alternative livelihoods.

6. Cultural and Social Impacts

- Archaeological or cultural sites in the area.

- Potential for social conflict or dislocation.

7. Legal Framework

- Review of local and national laws regarding land acquisition and resettlement.

- Assessment of compliance with international standards.

8. Stakeholder Engagement

- Identification of key stakeholders (local communities, government agencies).

- Plans for public consultation and information dissemination.

9. Mitigation Measures

- Outline of proposed measures to minimize adverse impacts.

- Plans for monitoring and evaluation of impacts.

10. Timeline and Resources

- Estimated timeline for resettlement process.

- Budgetary considerations and resource allocation for resettlement activities.