



SOMALIA URBAN RESILIENCE PROEJCT

NAGAAD PROEJCT

HARGEISA MUNICIPALITY

UPDATED STAKEHOLDER ENGAGEMENT FRAMEWORK (SEF)

**Originally Updated for SURP II Second Additional Financing in
April 2022**

Updated for SURP II Third Additional Financing in June

2024 Updated for SURP II Fourth Additional Financing in

August , 2025

Table of Contents

Introduction.....	1
Project Description	1
1.2 Project Development Objective:.....	1
1.3 Implementation Arrangements	2
1.4 Project Implementation Status.....	2
1.4 Activities to be funded under AF4.....	3
2. Summary of Previous Stakeholder Engagement	3
2.1 Public consultations, workshops and meetings.....	3
2.2. Information Disclosure	8
2.3 Consultations to Inform Selection of Priority Projects and Preparation of AF4	9
3. Stakeholder Identification and Analysis	10
3.1 Project-Affected Parties.....	10
3.2 Other Interested Parties.....	11
3.3 Disadvantaged/Vulnerable Groups with Specific Needs for Engagement	13
4. Stakeholder Engagement Program.....	14
4.1 Strategy for Information Disclosure	15
4.2 Strategy for Stakeholder Engagement and Consultation.	16
4.3 Proposed Strategy to Incorporate the Views of Vulnerable Groups.....	19
4.4 Addressing Security Concerns.....	19
5. Resources and Responsibilities.....	19
5.1 Project Implementation Unit.....	19
5.2 Project Coordination Unit.....	19
5.3 Engineering and Supervising Consultant.....	19
5.4 Contractor	20
5.5 Budgetary Resources for Stakeholder Engagement.....	20
6. Grievance Mechanism	20
6.1 Overview and Uptake Channels	20
6.2 Grievance Management and Appeal Process.....	21
6.3 Workers Grievance Redress Mechanism.....	22
6.4 Grievances Related to Gender Based Violence	23
7. Monitoring and Reporting	23
 Annex A: Sample Grievance Registration Form	 25
Annex B: Previous Stakeholder Engagement	26
Annex C: Stakeholders Consulted	31
Annex D: Summary of Consultations with Key Stakeholders.....	32
Annex E: Summary of AF3 Consultations	35
Annex F: Summary of AF4 Consultations.....	39

List of Tables

Table 1: Nagaad Project Components	1
Table 2: Component Four Implementation Progress.....	Error! Bookmark not defined.
Table 3: Project Affected Parties.....	Error! Bookmark not defined.
Table 4: Nagaad project Other Interested Parties.....	12
Table 5: Nagaad Project Disadvantaged/Vulnerable Groups	14
Table 6: Information Disclosure Strategy	15
Table 7: Preparation Stage Stakeholder Engagement Strategy	16
Table 8: Preconstruction and Construction Stage Stakeholder Engagement Strategy	Error! Bookmark not defined.
Bookmark not defined.	
Table 9: Post Construction Stage Stakeholder Engagement Strategy	18
Table 10: Grievance Reporting Contact Details.....	Error! Bookmark not defined.

List of Figures

Figure 1: Nagaad project Grievance Appeal Process.....	22
--	----

ABBREVIATIONS AND ACRONYMS

AF	Additional Financing
AF4	Fourth Additional Financing
AM	Accountability Mechanism
AREAS	Action for Rural Education and Agriculture Solutions
CERC	Contingent Emergency Response Component
CSO	Civil Society Organization
CWW	Concern Worldwide
E&S	Environmental and Social
ESF	WB Environmental and Social Framework
ESHS	Environmental, Social, Health and Safety
ESIA	Environment and Social Impact Assessment
ESMF	Environment and Social Management Framework
ESMP	Environment and Social Management Plan
ESS	Environmental and Social Standard
ESS1	ESS1: Assessment and Management of Environmental and Social Risks and Impacts
ESS10	ESS10: Stakeholder Engagement and Information Disclosure
FCV	Fragility, Conflict and Violence
GBV	Gender-Based Violence
GRC	Grievance Redress Committee
GM	Grievance Mechanism
IDP	Internally Displaced Persons
LMP	Labor Management Procedures
GRM	Grievance Redress Mechanism
GRS	Grievance Redress Service
HGL	Hargeisa Local Government
IDA	International Development Association
IDP	Internally Displaced Person
INGO	International Non-Governmental Organizations
IOM	International Organization for Migration
M&E	Monitoring and Evaluation
MARDO	Mandhere Relief and Development Organization
MIS	Management Information System
MoECC	Ministry of Environment and Climate Change
MoPWRH	Ministry of Public Works, Reconstruction, and Housing
MS	Moderately Satisfactory
MS	Moderately Satisfactory
NbS	Nature-based Solutions
NGO	Non-governmental Organization
NRC	Norwegian Refugee Council
OHS	Occupational Health and Safety
O&M	Operations and Maintenance
OPM	Office of the Prime Minister
PAP	Project-Affected Party
PCU	Project Coordination Unit
PIU	Project Implementation Unit
PDO	Project Development Objective
RF	Resettlement Framework
RAP	Resettlement Action Plan
SEF	Stakeholder Engagement Framework
SEP	Stakeholder Engagement Plan
SUIPP	Somalia Urban Investment Planning Project
S	Satisfactory
SDS	Sustainable Development Solutions
SMPF	Somali Multi Partner Fund
SURP I	Somalia Urban Resilience Project

SURP II	Somalia Urban Resilience Project Phase II
TBC	To Be Confirmed
UN	United Nations
UNOPS	United Nations Office for Project Services
WASH	Water Sanitation and Hygiene
WB	World Bank
WBG	World Bank Group

1 Introduction

The Somaliland is implementing the second phase of the Somalia Urban Resilience Project (SURP-II) (Nagaad project), with the support of the World Bank. The Stakeholder Engagement Framework (SEF) was updated for the SURP-II Addition Financing 1 (AF1) and 2 (AF2) and disclosed in April 2022. The SEF was again revised for AF3 and disclosed in August 2024. This update is prepared for the Project's fourth additional financing (AF4). 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. This chapter provides a brief description of the Nagaad Project including its development objectives, components, and implementation arrangements. This chapter also provides an overview of the project's implementation progress, and a description of the activities to be funded under AF4 to be implemented in the City of Hargeisa in Somaliland.

1.1 Project Description

The Nagaad project seeks to strengthen urban resilience and governance in key Municipalities. Currently, the Project is being implemented by the Municipalities of Mogadishu (Benadir Regional Administration), Baidoa (Southwest State), Garowe (Puntland State), Kismayo (Jubbaland State), Beledweyne (Hirshabele State), and Dhuusamareeb (Galmudug State) in Somalia. These cities were selected based on their political, economic, and security relevance as well as their vulnerability (concentration of Internally Displaced Persons (IDPs) and urban population growth). The Nagaad Project was preceded by the successfully implemented first phase of SURP also preceded by another successfully implemented Somalia Urban Investment Planning Project (SUIPP). The original grant of US\$112 million (SDR 82.15 million) was approved on December 19, 2019, and became effective on February 24, 2020. The first additional financing (AF1 -P178887)¹ of US\$41.5 million (US\$21.5 million from the Somali Multi Partner Fund (SMPF) and US\$20 million from IDA) was declared effective on July 14, 2022.² The second AF (P179775) of US\$50 million³ for Somalia was declared effective on January 16, 2023. The third AF (P181512) of US\$40 million from IDA and US\$10 million from SMPF was declared effective in August 2024. Taken together, SURP-II will have a total budget envelope of US\$278.5 million, with a current closing date of December 31, 2026. The Project is seeking a fourth additional financing (AF4) to scale up project activities in the City of Hargeisa.

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". The Project is structured into the following five components captured in Table 1.

Table 1: Nagaad Project Components

Component	Description
Component 1: Urban Infrastructure and Services (USD 108 million)	Supports preparation and implementation of infrastructure investments, including design and supervision. Participatory decision-making is used to identify investments.
Component 2: Institutional Strengthening and Analytics (US\$2 million)	Strengthens core municipal functions through technical assistance on informal settlements, climate-resilient operation, and maintenance (O&M), urban governance, solid waste management, and mayors' forums.
Component 3: Project Management and Capacity Building (US\$ 28.5 million)	Supports project management costs, including monitoring and evaluation, as well as the capacity building of the PCU, PIUs, and relevant municipal staff.

¹ Under the first AF, the closing date was extended by 24 months to December 31, 2026, to allow for adequate completion of the CERC.

² The processing of US\$20 million was to replenish funds which were reallocated to Component 4: Contingent Emergency Response to respond to the worsening drought. The current US\$153.5 million is financed by an IDA grant of US\$70 million, as well as three trust fund grants under the Somalia Multi-Partner Fund (SMPF) (TF0B1409, TF0B1519, and TF0B8532) in the amount of US\$45 million, US\$17 million, and US\$21.5 million.

³ The dedicated drought response component (Component 4) was introduced under the second AF and the funds from the CERC added to the new component and financed by the Crisis Response Window (CRW)-Early Response Financing (ERF).

Component	Description
Component 4: Response to Urban Forced Displacement (USD 65 million)	Provides urgent support to drought-induced Internally Displaced Persons (IDPs) and host communities to reduce the strain on urban areas.
Component 5: Contingent Emergency Response Component (CERC). (USD 0)	Allows for rapid reallocation of uncommitted project funds to address eligible emergency needs in the event of a natural or man-made crisis

Component 4 was added to the project following the AF2 and combines activities funded under AF1 which supported drought response activities under SURP-II's CERC. Component 4 implemented by the International Organization for Migration with the federal Ministry of Public Works Reconstruction and Housing (MoPWR&H) in association with its partners in the Danwadaag Consortium which includes International Non-Governmental Organizations (INGOs) such as the Norwegian Refugee Council (NRC) and Concern Worldwide (CWW) was concluded in October 2024.

1.3 Implementation Arrangements

The Nagaad project is managed by a Project Implementation Unit (PIU) established in each of the six municipalities and is supported by a National Project Coordination Unit (PCU) domiciled at the federal MoPWR&H. The implementation arrangements will be adjusted to reflect a new PIU in Hargeisa that will be responsible for procuring and implementing investments and for the day-to-day supervision and monitoring. The federal PCU will provide backstopping support. An inter-ministerial steering committee for Somaliland will be established to provide strategic oversight and guidance. Activities under component 1 are supervised by an engineering and supervision firm, the United Nations Office of Project Services (UNOPS) which has been contracted to carry out civil works supervision and provide technical support, including in Hargeisa.

1.4 Project Implementation Status

As of February 2025, cumulative disbursement is US\$94.65 million, 50 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* (MS) 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 effective municipal PIUs, a PCU at the federal MoPWRH providing backstopping, coordination, and quality assurance, and inter-ministerial project steering committees at state and federal levels providing strategic guidance and oversight. Most ongoing civil works in Baidoa, Kismayo, and Garowe (Component 1) will be completed by June 2026. BRA Mogadishu, Dhuusamareeb, and Beledweyne have commenced civil works, with an expected end date of roads by September 2026.⁴ The United Nations Office for Project Services (UNOPS) is providing design and supervision across the cities. Drought response activities (Component 4) were successfully completed in September 2024, providing life-saving assistance to more than 1 million people.⁵ 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.

⁴ Baidoa and Garowe have completed two civil works packages each, while Kismayo has completed one package and Mogadishu several quick win investments, all valued at \$29.12million. Currently, there are two additional packages underway in Baidoa, three in Kismayo and additional quick win investments in Mogadishu to be completed by June 2026 at \$26.97 million. A further \$33.81 million will be committed as Mogadishu signed four civil works contracts in Feb '25 and Dhusamareeb signed one contract, while Beledweyne will sign 3 contracts in Mar '25 and Garowe one drainage contract in April '25. These civil works are expected to be completed by Sept '26. The preparation of drainage investments in Mogadishu, Kismayo, Garowe and Baidoa has taken a considerable amount of time due to the necessity of conducting flood risk assessments and preparing designs. The procurement of drainage investments, totaling \$31 million across the four cities, is set to begin in April, with an anticipated completion date of November 2026.

⁵ 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.

1.4 Activities to be funded under AF4

While the PDO will remain unchanged, a summary of the key changes proposed under AF4 is presented in Table 2.

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 and investments.
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\$5 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	Targets to be changed for PDO and intermediate indicators to reflect the scale-up activities. Intermediate indicators edits and new indicators added to reflect the refined project approach.
Changes to closing date of the project	Extend the closing date of the project from December 31, 2026, to December 31, 2028, including the closing dates of three RETFs to align with the project closing date.
Add city level implementing agency for Hargeisa	Hargeisa city.

2. Summary of Previous Stakeholder Engagement

In line with the original SURP II SEF and the updated AF1, AF2 and AF3 SEF, inclusive stakeholder engagement activities have been undertaken for specific subprojects in each municipality. The identification and prioritization of investments have been through a vigorous and inclusive process. The participatory process has been ongoing since 2016 when the preparatory project, Somalia Urban Investment Planning Project (SUIPP), was used to identify investments in the cities of Mogadishu and Garowe, and later in Baidoa and Kismayo in 2019 through SUIPP-AF (these were primarily roads). Dhuusamareeb and Beledweyne were the last two cities to join the project, and their infrastructure needs were similarly identified under SURP-II in 2023 financed under the third AF. The PIUs consulted key stakeholders including project-affected parties and other interested parties on the priority infrastructure sub-projects and the SEF has been updated to reflect these consultations. The stakeholder engagement also gathered feedback on the perceptions and benefits of the investments implemented under the parent project and the three AFs. The following is a summary of the stakeholder engagement conducted during (i) public consultations, workshops, and meetings; (ii) information disclosure, and (iii) project implementation under SURP I, SURP II and SURP II AFs (AF1, AF2 and AF3). Annex B and C present the outcome of previous stakeholder consultations and list of stakeholders consulted. Annex D outlines the detailed outcome of stakeholder consultations undertaken for AF1 and AF2, while Annex E and F present a comprehensive outcome of stakeholder consultations for AF3 and AF4 respectively. Under AF 4, 106 males and 35 females were consulted.

2.1 Public consultations, workshops and meetings

Table 3 below presents a summary of public consultations, workshops and meetings in the various project areas under the parent project and AFs including AF4.

Table 3: Public Consultations, Workshops and Meetings

Project	Municipality	Dates	Remarks
SURP I	Mogadishu	May 2016 and March 2017	Consultations that informed the priorities under AF 3. Since the cities did not have enough funds to cover the costs of investing in all the prioritized infrastructure, the pending investments are now prioritized under AF3. Public consultation on the ESMF/RF with Municipal Council, Ministries and Agencies, UN agencies, CSOs and village elders.
		Early 2019	Pre-construction site visits and discussions with the host community.
		January 2019	Environmental Awareness and consultation workshop with institutional experts for the first subproject in Simad Road in Hamar Jajab District.
SURP II		July-August 2019	Public consultation on the revised ESMF/RF and newly prepared SEF and LMP with district residents, project-affected persons, CSOs, civil servants, UN, and project workers.
November 2021, February 2022, August-September 2022		Consultation with the community groups on BRA quick wins investment prioritization on catchment ponds and roads (B15 and B20). Consultation with the community groups, local leadership, and federal government on BRA investment prioritization on trunk drainage.	
March 2023		Stakeholders’ consultation on prioritization of package one investment roads before starting the preparation of the Project.	
July-Sept 2023		Engagement with communities and local administration to review the road's design disseminate the findings of drainage Condition Assessment Report and disclose proposed resolution of the Grievance associated to the B15 Road.	
AF 3		January 2024	Consulted project-affected parties and other interested parties on the proposed sub-projects and gathered feedback on the perceptions and benefits of the investments implemented under the parent project and AF 1 and AF 2.
SURP I	Garowe	March 2016-January 2017	Public consultation on the ESMF/RF with Municipal Council, Ministries and Agencies, UN agencies, CSOs and village elders.
SURP II		Early 2019	Consultations that informed the priorities under AF 3. Since the cities did not have enough funds to cover the costs of investing in all the prioritized infrastructure, the pending investments are now prioritized under AF3. Pre-construction site visits and discussions with the host community.
		March 2019	Environmental Awareness and consultation workshop with concerned authorities, institutions, and the local residents for the first subproject in Jilab Road in Jilab IDPs camp.
		August 2019	Public consultation on the revised ESMF/RF and newly prepared SEF and LMP with government representatives, local private companies, IDPs and vulnerable groups, women and youth groups, host communities, academia, disability association and religious and traditional elders.
AF3		December 2022	Wadajir community engagement for package II. Continue community involvement in Halgan for trees protection and updates for road junctions’ access.
SURP I	Baidoa and Kismayo	February 2019	Consultations that informed the priorities under AF 3. Since the cities did not have enough funds to cover the costs of investing in all the prioritized infrastructure, the pending investments are now prioritized under AF3. Project start-up consultation involving both the government stakeholders and community representatives to discuss the roads selections for feasibility

Project	Municipality	Dates	Remarks
SURP II			studies and engineering designs and to share the plans for project activities implementation.
		April-May 2019	Engaging institutional stakeholders and members of public to consult on the revised ESMF/RF and early draft SEF and LMP.
		May-June 2022	To provide the public correct information about project progress and to hear and respond to their concerns.
		May-June 2023	The community consultation was to give the community update of the project, safety of the environment and also community job creation for women, IDP and youth.
		August-September 2023	Baidoa: Awareness raising on project E&S aspects to diverse stakeholders including local communities. Update on project progress, GBV /SEAH and child labour, environment and community health and safety.
AF 3		January 2024	Consulted project-affected parties and other interested parties on the proposed sub-projects and gathered feedback on the perceptions and benefits of the investments implemented under the parent project and AF 1 and AF 2.
SURP II	Beledweyne and Dhuusamareeb	April 15, 2021, and May 2nd 2021	SEF, LMP, RF, and ESMF, update consultations.
	Beledweyne	June 2023	Consultations that informed the priorities under AF 3. Since the cities did not have enough funds to cover the costs of investing in all the prioritized infrastructure, the pending investments are now prioritized under AF3. Weekly meetings to update on accomplished tasks and plan for the following week.
	Dhuusamareeb	July 2023	Consultations that informed the priorities under AF 3. Since the cities did not have enough funds to cover the costs of investing in all the prioritized infrastructure, the pending investments are now prioritized under AF3.
AF 3	Beledweyne and Dhuusamareeb	January 2024	Consulted project-affected parties and other interested parties on the proposed sub-projects and gathered feedback on the perceptions and benefits of the investments implemented under the parent project and AF 1 and AF 2.
AF4	Hargeisa	April 24 2024	<ul style="list-style-type: none"> PCU had its first consultation with the Mayor of Hargeisa, and the Directors for Public Works, and Administration and Finance. During this consultation, in addition to introducing the proposed AF4, the World Bank's ESF was elaborated, the Environmental and Social Commitment Plan (ESCP) was explained and the need to update the SEF, ESMF, RPF, and LMP was discussed.
		March 3 rd 2025	<ul style="list-style-type: none"> Further consultations were undertaken with directors of various departments under the Hargeisa Municipality 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. Additional information relevant to the project shared during the consultations include: <ul style="list-style-type: none"> The HLG has a Social Affairs Department which is also responsible for environmental management. The HGL has also developed a Management Information System (MIS) system to manage local government operations including tracking customer service (also covers grievances). The Hargeisa PIU can leverage on the said MIS to address project- related complaints. 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.

Project	Municipality	Dates	Remarks
			<ul style="list-style-type: none"> The city has a significant IDP population in the city's peripheries and there is a minority clan (Gabooye) that will require special considerations to ensure their effective participation on the project and can access project benefits and opportunities. Hargeisa faces persistent infrastructural challenges, such as inadequate water and electricity supply, poor drainage and inadequate drainage infrastructure, poor road network in periphery sub districts etc.,) that significantly impact the daily lives of its residents. Hargeisa is a peaceful city but has clear clan divisions which provide a sense of identity and belonging but also contribute to political challenges and heated debates when it comes to resource allocation. 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 vulnerable groups such as expectant mothers, school children, senior citizens and the sick.
		March 3-11, 2025, April and June 2025	<ul style="list-style-type: none"> 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. The identified stakeholders 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. A total of twelve (12) meetings were held from March 3-11, 2025.
			<p>Responses from community members and community-based structures</p> <ul style="list-style-type: none"> Job opportunities: Community members indicated they expected to be provided with jobs during construction. Gender: Whereas some women indicated they would be doing minor work, such as making food for the workers and workers, some clan elders and religious leaders said it was culturally inappropriate to have women work in road construction, however, the mentioned that 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: There is a high risk for IDPs who live in the city peripheries with poor security lighting. <p>Involuntary Resettlement: Although the current local government has allocated land to IDPs displaced from the central business district, moved the urban poor away from a flood-prone area next to a stormwater retention pond, and provided them with resettlement land in the municipality, it was reported that around four years ago, roads were cleared of structures without compensation.</p> <ul style="list-style-type: none"> 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.

Project	Municipality	Dates	Remarks
			<ul style="list-style-type: none"> 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 (VLD). 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. <p>The following feedback was provided to the PAPs.</p> <ul style="list-style-type: none"> 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 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: <ul style="list-style-type: none"> 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.

Project	Municipality	Dates	Remarks
			<ul style="list-style-type: none"> 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: Community members from the sub-districts indicated they were happy to be consulted and hoped their input would be considered. Some civil society members stated that the municipality needed to improve its engagement with civil society. Prioritization of investments. The criteria considered 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 living on the city's outskirts. The inner ring road and drainage topped the list of priorities. Annex F presents the priorities.

2.2. Information Disclosure

Under the parent project and the three AFs, the PIUs disclosed both framework documents and site-specific plans including updated versions of the frameworks and plans. Prior to project appraisal, the PIUs and engineering and supervision consultant disclosed to project affected parties and other interested parties, information on the overall project design, anticipated environmental and social impacts and appropriate mitigation measures. The disclosure process utilized public forums, individual meetings, community action groups and emails. The same disclosure process will be utilized under AF 4.

Table 4: Disclosure of initial and updated versions of both framework documents and site-specific plans undertaken

City	Date	Disclosed Instruments
Mogadishu	June 2018	The summary of ESMF and RF for SURP I and the translation in Mogadishu and WB website.
	January-March 2019	The specific ESMP and RAP for the first SURP I subproject disclosed through local newspaper, BRA & District HQ notice boards and social media.
	July-August 2019	The summary translation of SURP II ESMF, RF, LMP and SEF.
	September 2022	Disclosure of ESF instruments for Quick Win Investments: LMP, SEP and ESMP.
Garowe	December 2018 to February 2019	The summary of ESMF and RF for SURP I and the translation in Garowe and WB website.
		The specific ESMP and ARAP for the first SURP I subproject through local newspaper, website, Garowe Municipality HQ notice boards and public gathering places.
	July and August 2019	The summary translation of SURP II ESMF, RF, LMP and SEF.
	June 2021 and August 2022	Garowe SEP in June 2021 and updated SEP in August 2022.
	December 2022	Informed community on project activities, shared GRM procedures and created awareness on GBV/SEAH prevention and response.

	May 2023	The PIU held one community consultation to update on project progress and project disruptions. Residents of different SURP II Roads participated in the meeting.
Dhuusamareeb	June 2023	Combined ESMP and SEP.
Beledweyne	July 2023	Combined ESMP and SEP.
Kismayo	4th May 2023 - 8th May 2023.	Sensitization of local communities on the imminent asphalt work.
Baidoa and Kismayo	Baidoa SEP was disclosed in August 2020. Kismayo SEP was disclosed in March 2021 and the updated SEP in October 2023.	
Component 4	<ul style="list-style-type: none"> ERC ESMF disclosed in June 2022. Component 4 ESMF disclosed in September 2022. ESMP for Baidoa Barwaaqo disclosed March 2023. ESMP ADC Baidoa disclosed November 2022. BRA ESMP disclosed in June 2022. Garowe Hoodale site ESMP disclosed March 2023. 	
Hargeisa	Before project effective date	Updated SEF, ESCP, ESMF (with SEA/SH Action Plan), RF and LMP.
	Before commencement of project activities	Prepared site-specific SEP, LMP and ESMP.

2.3 Consultations to Inform Selection of Priority Projects and Preparation of AF4

Key stakeholders including the local government, local community and civil society organizations were consulted on potential investments/sub-projects as outlined in Table 5. The PIU engaged a wide range of stakeholders including IDPs, women, youth, PWDs, senior citizens as well as the representatives of the Federal and Local governments, CSOs, business representatives and community leaders. The stakeholders provided a more detailed proposal on priority investments, their description, estimated cost, and the justification for their selection (See Annex F). The selection criteria in identifying the priority investments considered factors such as the potential for AF4 funding, alignment with local government plans, clan inclusivity, and provision of access to service centres and the city, especially for IDPs who live on the outskirts.

Table 5: Potential Investments Recommended by Consulted Stakeholders

Stakeholders	Potential Investments Recommended
Government officials.	<ul style="list-style-type: none"> As urbanization accelerates, significant investments in infrastructure—particularly in transportation, water management, drainage systems, and public utilities—are required. Due to Hargeisa's inadequate drainage system, flash floods remain a persistent threat during the rainy seasons. Heavy rainfall causes water to 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 struggling 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.
Members of community-based organisations.	<ul style="list-style-type: none"> Connectivity between the different areas of the city should be a high priority.
Community members from the districts.	<ul style="list-style-type: none"> Drainage was of high priority. The inner ring road is of high importance as it connects several districts.

3. Stakeholder Identification and Analysis

For the purpose of this SEF update (and pursuant to ESS10), stakeholders are categorized into (i) “project-affected parties” and (ii) “other interested parties.”

3.1 Project-Affected Parties

Project-affected parties include those likely to be affected by the project because of actual impacts or potential risks to their physical environment, health, security, cultural practices, well-being, or livelihood. The table below indicates potential project-affected parties of Nagaad Project.

Table 6: Project Affected Parties

No	Project-affected parties	Relevance to the project	Indicative list	Experience to Date
1	Target beneficiaries including communities living within areas where project activities will be implemented.	<ul style="list-style-type: none"> Target communities are likely to benefit from social and economic investment or livelihood initiatives to enhance community resilience and addressing gender gaps through its inclusive requirements and incentives. 	<ul style="list-style-type: none"> Entails local communities living within areas where project activities will be implemented. This will include men, women, youth, urban poor, IDPs, Returnees, Refugees, youth organizations, elders, religious leaders. 	<ul style="list-style-type: none"> The project has benefitted 494, 910 people who live within a 500 m range from the built infrastructure. These include beneficiaries of urban roads, drainage systems, bridges and other infrastructure improvements. All seven cities have a significant IDP population. For Hargeisa, the IDPs are concentrated in the city’s peripheries. Further, there is a minority clan (Gabooye) in Hargeisa that will require special considerations.
2	People who will be physically or economically displaced by the project.	<ul style="list-style-type: none"> The project is likely to cause project-related land acquisition and restrictions on land use, which may lead to physical displacement (relocation, loss of residential land or loss of shelter) and economic displacement (loss of land, assets or access to assets, leading to loss of income sources or other means of livelihood). 	<ul style="list-style-type: none"> People who reside or have structures in the Right of Way (ROW) of the project road. Street vendors, vehicle drivers and businesses operating along the project road. Vulnerable or disadvantaged groups, upstream and downstream households, and businesses. 	<ul style="list-style-type: none"> No physical displacement occurred under SURP-II and thus far under the parent project and the three AFs. The economic displacement largely relates to temporary livelihood impacts on mobile vendors or roadside businesses during the construction (approximately for one month at a given road section), which is also minimized and compensated. Large-scale economic displacement is expected in Mogadishu due to road and trunk drainage subprojects under AF 3. The city has deposited compensation funds into the escrow account and committed to compensating all those affected. Concerns majorly relating to valuation of affected property were resolved and agreed upon during the initial stages of the project via negotiation sessions and meetings. Vulnerability was taken into account during the compensation process, and livelihood support was provided to those who were vulnerable. In Hargeisa, roads funded by the city were cleared of structures without compensation around four years ago.

No	Project-affected parties	Relevance to the project	Indicative list	Experience to Date
				<ul style="list-style-type: none"> Also, the current local government has allocated land to IDPs displaced from the central business district. The urban poor moved away from a flood prone area next to a storm water retention pond also provided with land by the municipality.
3	People who will benefit from project-related employment or business opportunities	<ul style="list-style-type: none"> The project will generate employment or business opportunities for the community through construction and maintenance of the municipal infrastructure. 	<ul style="list-style-type: none"> Women, urban poor, youth, IDPs, PWDs, religious and ethnic minorities, minority clans, returnees, older persons and other disadvantaged groups will be engaged by the project to provide labour. Local business community who will benefit from local sourcing. 	<ul style="list-style-type: none"> The PIUs have advanced local employment and skills training for vulnerable groups and continue to provide logistical assistance to stakeholders in need to ensure inclusive participation. Conducted sessions with contractors on the employment of women and IDPs. Local Recruitment Plans to be prepared by all contractors at the bidding stage. Emphasized the inclusion of women and vulnerable groups within the workforce and on Grievance Committee (GCs). Women engagement inclusion plans prepared for each municipality are under implementation. The plans have been expanded to benefit youth, IDPs and PWDs. Internships for graduate engineers to be provided in the seven cities. PIUs are encouraged to explore measures to mitigate gender prejudices in construction and strengthen the inclusion of PWDs who still face numerous barriers, including employment.
3	People residing in the project areas	<ul style="list-style-type: none"> The project is likely to cause adverse environmental and social impacts on the people residing in the project areas. The project is also expected to bring about environmental and social benefits in the long term. 	<ul style="list-style-type: none"> Community members who are exposed to pollution, traffic safety risks, GBV-SEA/SH risks, among others. They may also benefit from the project in the long term. 	<p>No significant E&S have occurred under SURP II. Some of the negative impacts raised include air pollution, disruption to utilities (water supply and electricity), access to households and lack of temporary ramps and dust pollution. PIUs have successfully resolved 93% of reported grievances. No project-related SEA/SH incidents have been reported to the project GM likely due to fear of retribution. However, non-project incidents of GBV were documented during the implementation of AF2, where the project promptly referred survivors to GBV service providers. AF4 will strengthen case identification. Similar to AF3, the potential benefits of AF4 include: improved pedestrian traffic safety; reduced road flooding and roadside erosion; community accessibility to schools, health care centers, markets, water points and other livelihood activities; security, employment and skills training opportunities.</p>

3.2 Other Interested Parties

The term “other interested parties” refers to individuals, groups, or organizations with an interest in the project, due to either the project location, its characteristics, its impacts, or matters related to public interest.

For example, these parties may include regulators, government officials, the private sector, the scientific community, academics, unions, women's organizations, other civil society organizations, and cultural groups. The table below indicates potential other interested parties of SURP II and the AF4.

Table 7: Nagaad Project Other Interested Parties

No	Other interested parties	Relevance to the project	Indicative list
1	Local government.	<ul style="list-style-type: none"> Local government institutions protect the rights of inhabitants in the project area and represent the local communities/PAPs. SURP II will work closely with them. 	<ul style="list-style-type: none"> Hargeisa Local Government Directors, sub-district government officials, Municipality Departments; Municipal Council; District/zone offices; and District/zone Police.
2	State ministries and government agencies.	<ul style="list-style-type: none"> State ministries and government agencies are key stakeholders for the project and ensure project compliance with national legislation and collaboration with relevant national programs. 	<ul style="list-style-type: none"> Ministries of Public Works and Housing; Environment and Tourism; Mining, Water and Energy; Labour and Employment; Youth and Sports; Gender, Family Affairs and Human Rights, Refugees & IDPs and other relevant authorities and Ministry of Environment and Climate Change (MoECC).
3	UN Agencies.	<ul style="list-style-type: none"> UN agencies in Somalia support the government in service delivery as well as spur economic development, settlement of IDPs, refugees and returnees, development of infrastructure, humanitarian activities, and gender issues. There will be areas for collaboration with SURP II. 	<ul style="list-style-type: none"> UNHCR, UNHABITAT, UNDP, UNCDF, UNFPA, UNOPS, UNICEF, WFP, ILO, UNEP, UN Women.
4	International NGOs and bilateral donor agencies.	<ul style="list-style-type: none"> International NGOs and donor agencies in Somalia are primarily focused on humanitarian activities, economic empowerment, livelihood improvement, Water and Sanitation (WASH), education and gender issues. There will be areas for collaboration with SURP II. 	<ul style="list-style-type: none"> NRC, CWW, IRC, Save the children, World Vision International, DRC, CARE International, GIZ, TIS Plus USAID.
5	Community groups.	<ul style="list-style-type: none"> There are a number of community groups supporting particular groups of community members including vulnerable and disadvantaged groups. SURP II will work with them to reach out to such groups. 	<ul style="list-style-type: none"> Religious groups; community leaders; IDP and returnee community; child welfare groups; women groups; youth council; disability community.
6	Other key interests.	<ul style="list-style-type: none"> Key public and private interests include relevant government entities at the federal, municipality and district levels, water and power (electricity) supply utilities in the vicinity of the potential project areas. Most of the electrical power network in along the road reserve of the proposed roads and water pipeline network has also utilized the road reserves. Some of service powerline are very close to the roads. 	<ul style="list-style-type: none"> Municipality power. Press and media; Research and academic institutions. Local District Council of Hargeisa.
7	Civil society organizations including those championing the interest of vulnerable	<ul style="list-style-type: none"> They mediators between public authorities and communities. This empowers them to push forward social action and support sustainable and inclusive development pathways. 	<ul style="list-style-type: none"> Community Based Organizations. Women Groups. Self Help Groups.

No	Other interested parties	Relevance to the project	Indicative list
	individuals and groups.		
8	Project Financiers.	<ul style="list-style-type: none"> The World Bank. 	<ul style="list-style-type: none"> Provides financial resources for implementation of SURP II AF4 activities.
9	Other World Bank financed projects within the project area.	<ul style="list-style-type: none"> These projects seek to enhance service delivery and strengthen institutional operations and thus consistent with the objective of SURP II. 	<ul style="list-style-type: none"> Somalia Crisis Recovery Project (SRCP). RCRF III's support for pilot. Community Education Committees and Community Health Committees. Biyoole's support for community livelihoods. Barwaaqo, the Recurrent Costs and Reform Financing (RCRF) project.
10	Development partners.	<ul style="list-style-type: none"> Provide financing for similar interventions within Somaliland. 	<ul style="list-style-type: none"> Abu Dhabi Fund for Development. African Development Bank.
11	Media.	<ul style="list-style-type: none"> They promote public participation and community engagement; provide a variety of quality content that is universally accessible to a diverse audience on a national level. 	<ul style="list-style-type: none"> Mainstream media. Social media influencers.

3.3 Disadvantaged/Vulnerable Groups with Specific Needs for Engagement

Disadvantaged or vulnerable groups refers to those who are more likely to be adversely affected by the project or may be less able to take advantage of a project's benefits as compared with other groups due to their vulnerable status. Such groups are also more likely to be excluded from or are unable to fully participate in the mainstream consultation process. Table 8 presents the categories of disadvantaged and vulnerable groups encountered under the Nagaad Project and confirmed during the recent AF4 consultations (See Annex F) undertaken in Hargeisa with stakeholders and this includes women, poor households, youth, PWDs, older persons, women, illiterate communities, religious elders, ethnic minorities, returnees, and other vulnerable groups. There are also many diverse groups, including IDPs in the project area, and it is likely that some of them may present distinct social and cultural characteristics potentially fitting the ESS7 criteria. However, an in-depth assessment is required to ascertain whether these groups meet the criteria set out in paragraphs 8 and 9 of ESS7.

Various types of barriers may limit the capacity of such groups to effectively articulate their concerns regarding project risks and impacts and also inhibit their effective participation in project consultation and planning processes. As presented under Table 8, such barriers may include discrimination based on factors such as gender, disability, socioeconomic disadvantages, level of education, geographical isolation and lack of awareness about their rights and responsibilities. Other barriers include limited information on the project benefits and opportunities and mistrust towards institutions especially in Somalia's Fragile, Conflict and Violent (FCV) context. SURP II experience to date demonstrates limited inclusion of PWDs in the workforce and prejudices against women involved in civil works. PIUs are thus encouraged to explore measures to mitigate gender prejudices in construction and strengthen the inclusion of PWDs who still face numerous barriers in accessing project benefits and opportunities.

Recognizing the vulnerability of such groups and in line with the requirements of ESS10 and ESS1, this SEF articulates preliminary measures to ensure meaningful engagement and consultation with all vulnerable groups to ensure they are adequately informed about the project and can equitably access project benefits and opportunities in a culturally appropriate manner. This is also consistent with the World Bank's directive on addressing risks and impacts on vulnerable or disadvantaged groups. The directive requires Borrowers

to identify and mitigate risks and impacts on individuals or groups who may be more vulnerable to project risks and impacts including those based on age, gender, ethnicity, disability among others.

Under AF4, material mitigation measures to address the barriers and ensure meaningful engagement will be considered through close consultation with such groups when new project locations are determined. Such measures include ensuring all consultations are held in a culturally appropriate manner, free of manipulation, interference, coercion, discrimination, and intimidation. All the project bidding documents and contracts will include the requirement for fair treatment, non-discrimination, and equal opportunity for all. Project contractors and their workers will be required to understand and sign Codes of Conduct (CoC) as a strategy to ensure that all workers adhere to a set of standards and expected behaviors thus reducing the risk of SEA/SH. The project Grievance Mechanism (GM) will provide an opportunity for recourse to address any incidents of exclusion, such as in stakeholder engagement, information disclosure, and access to project benefits and opportunities. These measures to address the barriers will be reviewed as necessary after further consultation with all stakeholders and the SEF will be updated accordingly.

Table 8: Nagaad Project Disadvantaged/Vulnerable Groups

No	Disadvantaged /vulnerable groups	Potential barriers to limit effective stakeholder engagement	Approaches
1	IDPs, historically excluded groups, refugees, returnees and minority clans such as the Gabooye.	<ul style="list-style-type: none"> • Accessibility to IDP camps. • Ethnic complexity. • Lack of understanding or interest. • Exclusion by dominant groups. 	<ul style="list-style-type: none"> • Continuously engage with disadvantaged groups to understand their needs and priorities. • Interventions to provide equal access to services and resources for all, particularly targeting barriers faced by these groups. • Ring-fence benefits and opportunities such as employment. • Efforts to empower these groups through awareness, skills training, and access to information. • Regular assessment of how project interventions are impacting disadvantaged groups and implement corrective actions as applicable.
2	Poor households, such as female-headed, widows, elderly, orphans, persons living with severe illness.	<ul style="list-style-type: none"> • Poverty. • Absence of suitable family person to participate. • Mobility. • Lack of time to participate. • Lack of interest. 	
3	PWDs.	<ul style="list-style-type: none"> • Physical disabilities preventing mobility. • Various disabilities such as visual and hearing impairment. 	
4	Illiterate community members.	<ul style="list-style-type: none"> • Unable to understand the project and related information • Unable to effectively engage in consultation forums. 	
5	Religious and ethnic minorities, and other minority groups such as the Gabooye clan.	<ul style="list-style-type: none"> • Lack of representation in community leadership forums. • Unable to effectively engage in consultation forums. • Poverty. • Exclusion by dominant groups. 	
6	Female community members and female workers.	<ul style="list-style-type: none"> • Poverty. • Absence of suitable family person to participate. • Mobility. • Lack of time to participate. • Lack of interest. 	

4. Stakeholder Engagement

Stakeholder engagement is the continuing and iterative process by which the Borrower communicates and facilitates a two-way dialogue with the people affected by its decisions and activities, as well as others with an interest in the implementation and outcomes of its decisions and the project. The PIUs will ensure that stakeholder engagement begins as early as possible in project preparation to allow stakeholders' views and concerns to be considered in the project design, implementation, and operation.

The PIUs will also consider the different information access and communication needs of various stakeholder groups and individuals, including consideration of literacy, mobility and disability challenges, especially with vulnerable individuals and groups. This section describes the methodology for stakeholder engagement and information disclosure.

4.1 Strategy for Information Disclosure

ESS10 increasingly emphasizes that stakeholder consultation needs to be based on prior disclosure of relevant and easily accessible information in a timeframe that allows stakeholders to partake in meaningful engagement. To fulfil this requirement, the PIUs will apply a range of consultation and disclosure of information methods at each stage of the project that allow for effective stakeholder participation and timely provision of feedback as presented in Table 9. All relevant documents will be fully disclosed in local languages and in areas accessible to project-affected parties and using feasible techniques. Formats to provide information may include presentation printouts, non-technical summaries, project leaflets, and pamphlets, depending on stakeholder needs.

Table 9: Information Disclosure Strategy

Project stage	List of information to be disclosed	Methods of disclosure	Target stakeholders	Responsibilities
Project preparation stage (before project appraisal)	<ul style="list-style-type: none"> Summaries of framework ESF instruments (ESMF, RF, GBV-SEA/SH Action Plan, SEF, Grievance Mechanism (GM) and LMP. Relevant project information, including project design. Project benefits and opportunities, Environmental and Social (E&S) risks and impacts and appropriate mitigation measures. Community rights and entitlements. Criteria for selecting priority investments. Project-targeted interventions for vulnerable groups. 	<ul style="list-style-type: none"> Municipality and District/zone HQ office notice boards; Public forums. Social media platforms. Phone calls. Local newspaper/TV/radio stations. SMS. Local leadership offices Print messages pinned on notice boards of religious and community centres. World Bank website. 	<ul style="list-style-type: none"> Project affected parties, other interested parties and vulnerable groups. 	<ul style="list-style-type: none"> PIU and Engineering and supervision consultant. Municipality, District/zone office.
Pre-construction stage and during construction	<ul style="list-style-type: none"> Summaries of Site-specific ESF instruments including ESMP GBV-SEA/SH action plan, RAP, SEP, GRM, and LMP. Project-targeted interventions for vulnerable groups. Project benefits and opportunities, E&S risks and impacts and appropriate mitigation measures. Community rights and entitlements. 	<ul style="list-style-type: none"> Municipality & District HQ office notice boards. Public forums. Social media platforms. Phone calls. Local newspaper/TV/radio stations. SMS. Local leadership offices. Print messages pinned on notice boards of religious and community centres. World Bank external website. 	<ul style="list-style-type: none"> Project affected parties other interested parties, and vulnerable groups.. 	<ul style="list-style-type: none"> PIU and Engineering and supervision consultant. Municipality, District/zone office.

Project stage	List of information to be disclosed	Methods of disclosure	Target stakeholders	Responsibilities
Post-construction stage	<ul style="list-style-type: none"> Summary of the outcome of project and compliance monitoring (including GM). 	<ul style="list-style-type: none"> Summary to share in public forums. Media releases and/or newsletters via email. Project bulletins. Social media platforms. Local newspaper/TV/radio stations. Local leadership offices. Print messages pinned on notice boards of religious and community centres. 	<ul style="list-style-type: none"> Project affected parties other interested parties, and vulnerable groups. 	<ul style="list-style-type: none"> PIU and Engineering and supervision consultant. Municipality, District/zone office.

4.2 Strategy for Stakeholder Engagement and Consultation

The purpose of consultations is to receive and incorporate input from stakeholders for purposes of enhancing project design. Some of the key consultation areas include project design, potential E&S risks and impacts, including proposed mitigation measures, concerns and preferences of stakeholders regarding the project, GM and any other key decisions regarding the project made by the Borrower. Participation in the project consultations session and the expression of any opinions regarding the project should not lead to retaliation, abuse, or any kind of discrimination. The project team will ensure continued stakeholder feedback throughout the project lifecycle as a strategy for effective monitoring of E&S performance of the project. Table 10 11, and 12 present the indicative strategies for stakeholder engagement at each key stage of the project. Subproject-specific strategies will be prepared once the location of a subproject is determined.

Early involvement of the stakeholders is essential to ensure smooth collaboration with stakeholders for purposes of minimizing and mitigating E&S risks and impacts associated with AF4 activities. The SEF recommends the use of the five (5) principles that guide stakeholder engagement, and these include: purposeful; inclusive; timely, transparent; and respectful approaches that are also culturally appropriate and to take into consideration the concerns of all stakeholders. Throughout the AF4 cycle, PIU will provide stakeholders with opportunities to provide input, suggestions and raise their concerns regarding E&S risks and impacts as well as recommend appropriate mitigation measures. PIUs will also facilitate and process stakeholder input and provide timely response on the raised concerns.

- (a) **Project preparation stage (before project appraisal).** While the details of individual subprojects are unknown at this stage, the consultation will focus on a broader range of stakeholders to discuss aspects such as their general interests and concerns on the project and its potential positive and negative impacts, the project's environmental and social frameworks, disseminate relevant project information including project design and the criteria for selecting priority projects and community rights and entitlements among others. Table 10 presents more details on topics of discussion, methods to be used, timelines and responsible entities. This is also the stage where potential vulnerable/disadvantaged groups relevant to the project will be identified. Dissemination and reporting back to general stakeholders on the outcome of the monitoring and evaluation of the project will be also arranged.

Table 10: Preparation Stage Stakeholder Engagement Strategy

Target stakeholders	Topics of engagement	Methods to be used	Timeline and location	Responsibilities
Project affected parties (PAPs) including disadvantaged or vulnerable groups including women,	<ul style="list-style-type: none"> Relevant project information including the overall project design. Criteria for selecting priority projects. Project benefits and opportunities 	<ul style="list-style-type: none"> Public meetings. Individual meetings. Through FGD held with various community segments such as women, youth, elderly and vulnerable groups 	Prior to project appraisal at accessible public space.	PIU and Engineering and supervision consultant.

Target stakeholders	Topics of engagement	Methods to be used	Timeline and location	Responsibilities
youths, IDPs, PWD, Older persons, Refugees	<ul style="list-style-type: none"> Anticipated environmental and social risks and impacts and appropriate mitigation measures in ESMF, RF, SEF GBV-SEA/SH Action Plan, and LMP. Community rights and entitlements, project benefits and opportunities, among others. project-interventions targeting vulnerable groups 	<ul style="list-style-type: none"> Dissemination of project information through local radio stations and digital platforms such as social media as well as and use of printed materials such as brochures and flyers containing relevant project information. Public campaigns conducted in Somali dialects to foster community awareness and stakeholder engagement. 		
Other interested parties (local government, state ministries, UN agencies, bilateral donors, NGOs, and community groups)	<ul style="list-style-type: none"> Technical details on project design. Compliance with national regulations and collaboration with relevant programs. Vulnerable or disadvantaged groups affected by the project. Project-targeted interventions for vulnerable groups. Project benefits and opportunities, E&S risks and impacts and appropriate mitigation measures. Community rights and entitlements. ESF frameworks ESMF, RF, SEF GBV-SEA/SH Action Plan, and LMP. 	<ul style="list-style-type: none"> Public and individual meetings. Other form of official communication including letters, emails, reports and projects documents 	As needed (and continued throughout the project life).	PIU and Engineering and supervision consultant.

- (b) **Pre-construction and construction stage.** At this stage, the details of individual subprojects will be determined, and specific PAPs identified. The consultation will focus on PAPs to address their concerns through the implementation of subproject-specific design criteria and environmental and social plans. The Project will ensure that the GM will remain effective during the civil works to promptly address any grievances from the PAPs. The PIU will pay particular attention to vulnerable groups to ensure inclusion and non-discrimination. Dissemination and reporting back to general stakeholders on the outcome of the monitoring and evaluation of the project will be also arranged.

Table 11: Preconstruction and Construction Stage Stakeholder Engagement Strategy

Target stakeholders	Topics of engagement	Methods to be used	Timeline and location	Responsibilities
Project-affected parties (those who will be physically and economically displaced; those residing	<ul style="list-style-type: none"> Project design and characteristics. More site-specific ESF instruments including RAP, ESMP (including gender action plan), LMP and SEP. 	<ul style="list-style-type: none"> Public consultations. Individual meetings to disclose the RAP, SEP, ESMP, LMP and GM including preparation/for their implementation process. 	<ul style="list-style-type: none"> Prior to start of civil work at project district. The GM is maintained throughout 	<ul style="list-style-type: none"> PIU and Engineering and supervision consultant. District office. Contractor.

Target stakeholders	Topics of engagement	Methods to be used	Timeline and location	Responsibilities
in project areas)	<ul style="list-style-type: none"> Awareness-raising on the project GM. 	<ul style="list-style-type: none"> Pre-construction site visits and awareness-raising. 	the project life.	
Project-affected parties (people who will benefit from employment opportunities)	<ul style="list-style-type: none"> Selection criteria and TOR for employment opportunities for road construction work. 	<ul style="list-style-type: none"> Group meetings with the host community and support groups to engage vulnerable groups. 	<ul style="list-style-type: none"> Prior to start of civil work. 	<ul style="list-style-type: none"> PIU and Engineering and supervision consultant. District office. Contractor.
Other interested parties (community groups)	<ul style="list-style-type: none"> Strategies to reach out to vulnerable groups and address their concerns and interests. 	<ul style="list-style-type: none"> Individual meetings. Focus group meetings. Formal communication through email and letters. Project bulletins including brochures, pamphlets etc. 	<ul style="list-style-type: none"> Prior to start of civil work at project district. 	<ul style="list-style-type: none"> PIU and Engineering and supervision consultant. District office.

- (c) **Post construction/maintenance stage.** At this stage, the consultation will focus on the feedback from PAPs and the vulnerable groups on the performance of the project and the extent of implementation of environmental and social risk mitigations measures during the construction and operation stage. Under SURP II, beneficiary communities are happy about the newly constructed roads, drainage systems, and expressed appreciation to the municipalities and anyone who supported and funded the project and for being consulted and continuously informed on project progress. Motorists also expressed happiness with new roads and the subsequent reduction in travel time, comfort, and improved security due to streetlights. The consultation on employment opportunities for road Operation and Maintenance (O&M) works and skills upgrading will also be conducted. Areas for improvement and lessons learned will be identified for future sub-projects. Dissemination and reporting back to general stakeholders on the outcome of the monitoring and evaluation of the project will be also arranged. PIUs are encouraged to strengthen feedback sessions with PAPs and the vulnerable individuals and groups..

Table 12: Post Construction Stage Stakeholder Engagement Strategy

Target stakeholders	Topics of engagement	Methods to be used	Timeline and location	Responsibilities
Project-affected parties (people who will be physically and economically displaced; those residing in project areas).	<ul style="list-style-type: none"> Monitoring and evaluation of project benefits, impacts and environmental and social performance. 	<ul style="list-style-type: none"> End-line beneficiary survey on project impact. 	<ul style="list-style-type: none"> Following the completion of civil works and initial operation. 	<ul style="list-style-type: none"> PIU and Engineering and supervision consultant. District office. Contractor.
Project-affected parties (people who will benefit from employment opportunities).	<ul style="list-style-type: none"> Selection criteria and TOR for employment opportunities for road maintenance work. 	<ul style="list-style-type: none"> Meeting with District community maintenance committee. 	<ul style="list-style-type: none"> Following the completion of civil work. 	<ul style="list-style-type: none"> PIU and Engineering and supervision consultant. District community maintenance committee.
All stakeholders.	<ul style="list-style-type: none"> Reporting back to stakeholders on the outcome of the 	<ul style="list-style-type: none"> Public workshop. Media releases and/or 	<ul style="list-style-type: none"> Following the completion of SURP II. 	<ul style="list-style-type: none"> PIU and Engineering and supervision consultant.

Target stakeholders	Topics of engagement	Methods to be used	Timeline and location	Responsibilities
	monitoring and evaluation of the project.	newsletters via email. • Project bulletins.		

4.3 Proposed Strategy to Incorporate the Views of Vulnerable Groups

All views expressed by stakeholders will be carefully noted, documented in the consultation summary, and considered, including those of disadvantaged or vulnerable groups identified through consultation process (section 3.3). Under the Nagaad Project and the AF4, participation of vulnerable groups in the project will continue to be enhanced through strategies such as ensuring consultation meeting are held in accessible venues, provision of transport and sitting allowance during stakeholder consultations and ensuring that consultations are carried out in culturally appropriate manner. Vulnerable community members will continue to be provided with opportunities to express their views privately, such as in separate focus group discussions or phone interviews especially for female stakeholders and IDP communities. Easy-to-understand, non-technical language communication materials will be used during the consultations with illiterate stakeholders.

4.4 Addressing Security Concerns

It should be noted that some municipalities have security concerns in holding high-profile public consultations that involve a wide range of stakeholders. In such municipalities, stakeholder engagement will focus on low-profile groups meetings and individual interviews with an indicative sample of stakeholders. As noted during the recent stakeholder consultations (see Annex F), however, Hargeisa is reported to be a peaceful city and project work would not be disrupted.

5. Resources and Responsibilities

5.1 Project Implementation Unit

The PIUs will be responsible for the management and supervision of overall implementation of the Nagaad Project SURP-II and the AF4, including construction work by the contractor(s). Each PIU will report to the mayor of each municipality and at a minimum will be staffed with a Project Coordinator, Finance Specialist, Procurement Specialist, Environment and Social Specialist, Project Engineer, Monitoring and Evaluation Specialist, Finance and Admin Assistant and a male and a female Community Engagement Officer. The Environmental and Social Specialist has overall responsibility on preparation and implementation of the relevant E&S instruments, including the SEP, and ensuring continuous community outreach and consultation, monitoring, and evaluating program implementation and impacts, developing and managing the GM at the municipality, district/zone level and reporting results to various stakeholders. Other specialists and officers in each PIU will support the Environmental and Social Specialist in stakeholder engagement activities. A new PIU will be established in Hargeisa and will be responsible for the overall delivery of the new activities in Hargeisa, procuring investments and for day-to-day supervision and monitoring.

5.2 Project Coordination Unit

The Project Coordination Unit (PCU), based at the MoPWR&H of the federal government, will be responsible for providing oversight and monitoring of the project. The PCU will continue to be staffed with an overall Project Coordinator, an Engineer, a Financial Management Specialist, an Environment and Social Specialist, a Monitoring and Evaluation Specialist, a GBV/Gender Specialist and a finance and admin officer. For the AF4, the federal PCU will provide backstopping support and an inter-ministerial steering committee for Somaliland will be established to provide strategic oversight and guidance.

5.3 Engineering and Supervising Consultant

Each PIU is supported by a contracted engineering and supervision consultant, UNOPS in this case, who is responsible for monitoring the civil works contractors including their adherence to the E&S instruments including the respective SEP. Each PIU will also be supported by a third-party/independent monitoring (TPM) agent, who will provide quality assurance of the supervision carried out by the engineering supervision consultant. The TPM services will continue from the last phase.

5.4 Contractor

The contractor will assign an Environmental and Social officer, who will be responsible for the implementation of environmental and social requirements at construction sites. This officer will also maintain regular contact with affected communities at the site and assist in community awareness-raising and addressing any concerns and grievances.

5.5 Budgetary Resources for Stakeholder Engagement

An adequate budget has been provided to cover stakeholder engagement in the Project. Out of the ESMF total budget of USD 387,664, approximately USD 100,000, has been allocated to cover stakeholder engagement related activities such as consultations and meetings, E&S instruments disclosure, workshops and training, and operation of the GMs for the six initial cities. An additional budget of USD 20,000 will be provided to support AF4 stakeholder engagement activities in Hargeisa. The budget includes costs related to awareness creation of target beneficiaries and local leadership on the project and related activities, induction of project workers on the provisions of the E&S instruments as well as to monitor the implementation of all the SEF. This estimated budget does not include the cost of implementing mitigation and enhancement measures as these will be borne by the contractors. All administrative costs for the operation of the PIUs and PCU E&S team, including internal monitoring, have been incorporated into the overall Nagaad Project cost.

6. Grievance Mechanism

6.1 Overview and Uptake Channels

The Nagaad project has a functional GM in all the six cities where the Project is being implemented, and this will remain in place. Multiple grievance uptake channels including in person, by phone, text message or email are available for registering grievances or providing feedback. Grievances are handled by Grievance Committees (GCs) established in each district/zone where the Project is being implemented. The district/zone GC comprises representatives from women and youth groups, elders, and religious leaders; representatives of project affected persons; and representatives of the municipalities. The GC receives, registers, and acknowledges complaints, screens, and establishes the basis of the grievance. The GCs are responsible for grievance resolution and are supported by the engineering consultant and the contractor. Unresolved grievances are escalated to the PIU and PCU for resolution. Similar GC's will be setup in Hargeisa to support resolution of grievances associated with AF4 interventions. The contact details for each of the GCs are shown in the below table.

Table 13: Grievance Reporting Contact Details

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

The Hargeisa Municipality Grievance Mechanism, constituting various uptake channels, including a digital platform (City website), a toll-free line, social media handles (Facebook Page), and grievance desks at all district offices and dedicated complaints drop boxes, will enhance the project's three-tier Grievance Mechanism (GM) covering the federal, municipality, and district levels. The existing community committees will also be strengthened to serve as the first tier of grievance management at the district level, and the overall GM will be operationalized to handle confidential and sensitive cases such as GBV in line with the provisions in the SEA/SH Action Plan. The grievance log will be maintained, and the functionality and efficiency of the GM will be closely monitored by the respective PIU and the engineering and supervision consultant to enable stakeholders to raise issues and for the PIUs to receive, respond to, and promptly resolve concerns. The multiple channels for addressing grievances will consider literacy, mobility, and disability challenges facing project stakeholders. The grievance mechanism will be effective in addressing land and compensation-related aspects in line with the provisions of the Resettlement Policy Framework.

All stakeholders are informed about the project GM through strategies such as i) public sensitization forums, ii) development and distribution of leaflets or brochures with information on the project GM and iii) training of project staff and grievance committees on the project GM and their roles. The PIUs will ensure that the GM is easily accessible in all areas where the Project is being implemented. Stakeholders especially for the AF4

interventions will be informed of the general principles of the GM, how to submit complaints, timelines for addressing complaints. Further the PIUs need to:

- a. Address all project related concerns promptly and effectively in a transparent and cultural appropriate manner.
- b. Make the GM accessible to all PAPs at no cost and without retribution. Handle grievances in a discreet, objective and sensitive manner while being responsive to the needs and concerns of the complainant.
- c. Allow for confidentiality if requested in which case such grievances and comments raised will remain confidential and will be treated as such.
- d. Ensure that all grievances are recorded in grievance logbooks at the project sites and at the municipality offices where they are recorded digitally. A summary of registered grievances and actions taken is compiled on a weekly basis and the information is publicly available in each municipality.

6.2 Grievance Management and Appeal Process

The Project GM has three-tiers allowing for appeal to the next tier if grievances are not resolved to the satisfaction of the aggrieved. As presented in **Figure 1** below, the **first tier, the district/zone level GM** is where the GC operates with the support of the PIU and UNOPs. Grievances are expected to be resolved within a maximum of 10 days at this level. The Grievance Committee (GC) receives, registers, and acknowledges complaints in writing within a day. Afterwards, the GC screens and establishes the basis of the grievance within three days and in the case that the grievance is rejected because it is neither directly nor indirectly related to the Project, the reason for refusal is communicated to the aggrieved. Following this, the GC will have a maximum of three days to establish ways of resolving the grievances and another three days to implement the resolution. The mechanism will take into consideration the existing traditional practices which would be the most logical form of justice for most Somalis. The contractor is required to resolve grievances that relate to their operations. In this regard, the GC will forward the contractor cases that pertain to them, and the contractor will participate in the district/zone-level GC meetings to assist in resolving all contractor-related grievances. To date, 318 out of 322 reported grievances have been resolved. The nature of grievances includes lack of access to temporary ramps, utility disruption, construction related dust, payment delays, and road closure.

The areas for improvement include ensuring that themultiple grievance uptake channels considering literacy, mobility, and disability challenges facing project stakeholders in Somalia. The GM will also provide for safe, confidential, survivor-centred, and ethical reporting of SEA/SH incidents.

The functionality of the GM will be further strengthened under the parent project and the AF4 to enable stakeholders to raise issues and for the PIUs to receive, respond to, and promptly resolve concerns. To strengthen the GM, the PIUs will ensure:

- Ensure functionality of different grievance uptake channels (grievance box, email, toll free number, text message etc.) to allow for timely submission of complaints;
- Documentation of grievance handling process and better coordination across different GM actors (the contractor, district GC and PIU).
- Timely resolution of all reported complaints with feedback provided to the aggrieved party on resolution progress;
- Continued training of GM responsible project staff including the GC on the project GM and related processes;
- Continued sensitization of stakeholder on the GM process to facilitate submission of grievances
- Establishing grievance uptake locations in areas where poor and marginalized people live as a strategy to ease access to the project GM;
- Deploying community-specific communication strategies to allay fears about and increase comfort levels for submitting grievances and
- Where necessary, engage local intermediaries (community based or civil society organizations) to facilitate submission of grievances.

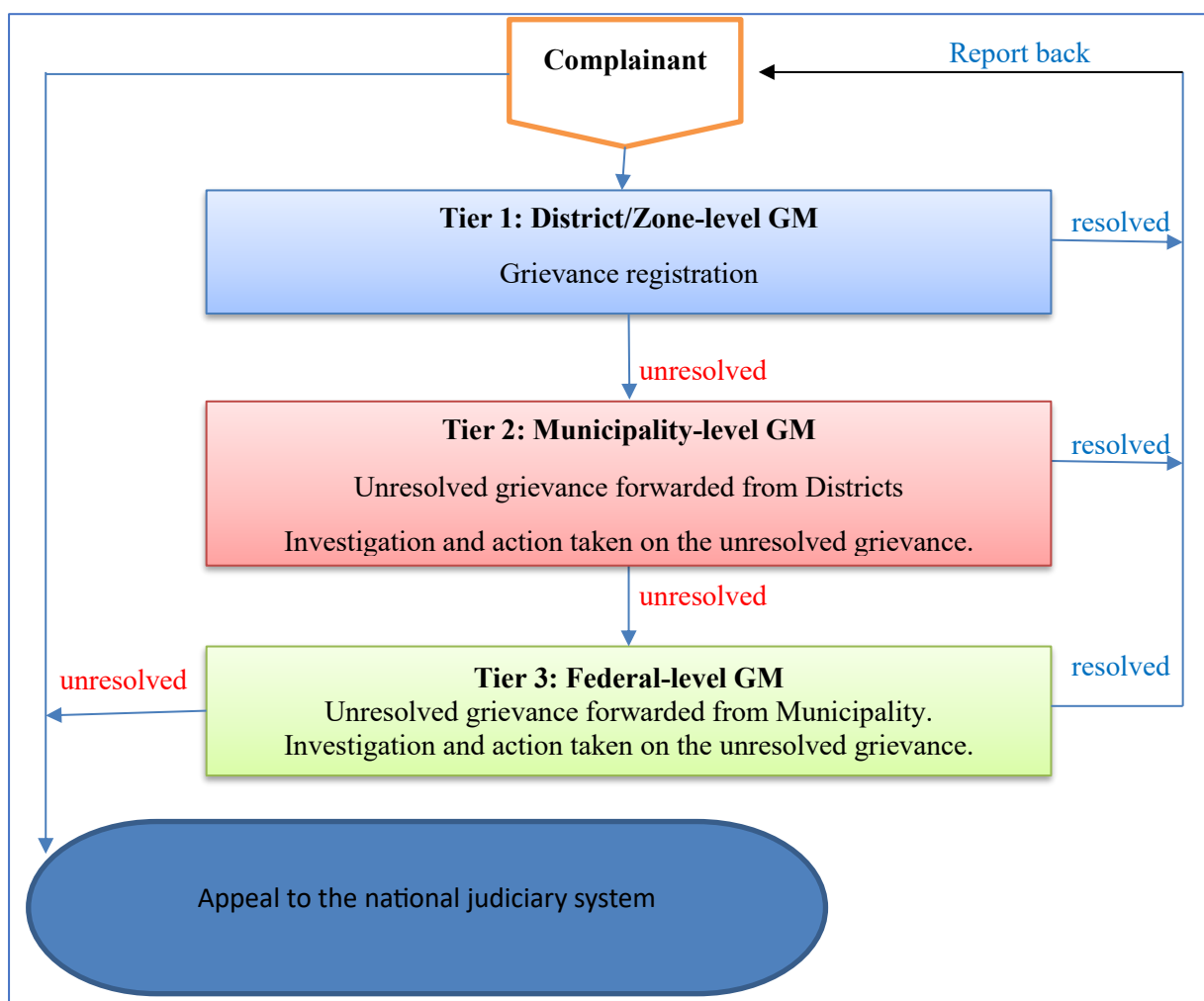


Figure 1: Nagaad Project Grievance Appeal Process

If not satisfied, the aggrieved person can seek redress through the appeal process. **Tier two (the municipal-level GM)** GC is comprised of senior municipality official, representatives from the PIU and UNOPS, and representatives of the aggrieved. **Tier three (Federal-level GM)** is comprised of the PCU, senior officials from the MoPWR&H, and other pertinent ministries or agencies of the federal government. It is important to note that the aggrieved parties are free to escalate their grievances to the national judiciary system at any time without needing to go through the project GM. The Hargeisa PIU will adopt and operationalise a similar GM structure to handle project related grievances.

6.3 Workers Grievance Redress Mechanism

The Nagaad Project has a functional GM for the project workers as defined in the Project's Labour Management Procedure (LMP). The GM for each worker category is described below.

Direct workers: Given the limited number of direct workers under Nagaad Project, the Project has a compact but effective grievance system for direct workers. Each unit engaging direct workers (PIU, PCU and the engineering and supervision consultants) hold periodic team meetings to discuss any workplace concerns. The grievance raised by workers and the actions taken will be recorded by each unit. The summary of grievance cases will be reported to the World Bank. Where the aggrieved direct worker wishes to escalate their issue or raise their concerns anonymously and/or to a person other than their immediate supervisor/hiring unit, the worker may raise the issue with responsible municipal authorities in the case of the PIUs and the MoPWR&H for the PCU. Where the engineering and supervision consultant has an existing grievance system (such as that available for workers in UNOPS), their direct workers should use such mechanism. Over the last five years of the project implementation under different iterations there has not been any unresolved grievances on the part of direct workers.

Contracted workers. The site manager and the E&S officer (or any other appropriate officers) of the contractor holds a daily team meeting with all present contracted workers in each site to discuss any workplace concerns. The grievances raised are recorded with the actions taken by the contractor. The summary of grievance cases is reported to the PIU and the engineering and supervision consultant as part of contractor's periodic report. Where appropriate and available, the contracted workers should be allowed to utilize an existing grievance mechanism within the contractor. Where the aggrieved workers wish to escalate their issue or raise their concerns anonymously and/or to a person other than their immediate supervisor, the workers may raise their issue with the PIU and/or the engineering supervision consultant. The contracted workers will be informed of the grievance mechanism at the induction session prior to the commencement of work. The contact information of the PIU and/or the engineering supervision consultants, E&S officers and specialists will be shared with contracted workers.

National appeal process: As per the national Labour Code (Article 134), any individual labour dispute can be submitted by any of the parties to the competent district labour inspector for conciliation, where such labour inspector is available. The inspector is mandated to attempt to settle the dispute within 14 days of its submission.

6.4 Grievances Related to Gender Based Violence

The Project has a differentiated and sensitive approach for addressing grievances related to Gender-Based Violence (GBV) and this will remain in place for the duration of the Project. This different approach mitigates the risks of stigmatization, exacerbation of psychological harm and potential reprisal. Each GC has a female GBV focal point who closely works with a female community engagement officer at each PIU supported by a GBV specialist at the national PCU. All GC members, as part of their onboarding process, are provided with training on dealing with GBV related grievances, in addition, they also participate in GBV awareness raising activities targeting the community and the contractors. For anonymity, GBV cases are reported through telephone hotlines responded to by the GBV female community engagement officer. All GBV cases are immediately signposted to service providers in accordance with the Project accountability and response framework. The various service providers who work with the project have the capacity to provide services such as medical and psychosocial support, emergency accommodation, legal aid and any other necessary services. At the contractor level GM, there is a GBV focal point who is a female member of the contractor GC who refers all GBV related cases from workers or community members to the Project GBV focal point. The recording of GBV grievances is as per the Project GBV accountability and response framework which clearly indicates how data will be recorded, reported, and stored. The process is based on a survivor centered approach which emphasizes consent, anonymity, confidentiality, empathy, and being non-judgmental. So far, however, the project has not had any GBV-related grievances.

7. Monitoring and Reporting

Monitoring and reporting is undertaken both internally by each PIU and externally by a third-party monitor (TPM) engaged by the Bank given the high levels of insecurity in Somalia limiting the Bank's presence on the ground. The project has 24 main indicators, against which the project performance is measured, which include number of participants and type of stakeholder groups in consultation activities during project implementation, frequency of consultation, topics/content of consultations, percentage of grievances addressed in the stipulated timeframe, number of people with improved access to climate-resilient urban infrastructure and services, and number of person days of employment created. E&S issues specific to a sub-project, identified in the ESMP and Gender Action Plan (GAP), such as the presence of gender disaggregated toilets for workers, use of personal protective equipment, air quality, soil erosion, etc., are also monitored. A baseline and a mid-term survey have been conducted and an endline survey will be carried out to measure economic and social impacts of the Project on the community, including vulnerable and marginalized groups, while also assessing inter-communal dynamics between IDPs and host communities. Internally, different monitoring reports are produced on a weekly, monthly, and quarterly basis by each PIU in close collaboration with the engineering supervision firm and the contractor. For the AF4 activities, similar monitoring indicators will be used and tracked through monthly and quarterly compliance monitoring carried out by the E&S Specialists. The Project has now developed a publicly accessible real-time monitoring and evaluation dashboard using Kobo Toolbox and Power BI. The outcome of monitoring activities by both the PIU and TPM are shared with the different stakeholders including community members through their established committees such as the GC and the operations and maintenance committees at the district/zone level. These

outcomes are also shared with the other municipalities implementing the Project and with the Bank, and lessons learned are drawn out to improve future project/sub-project designs and enhance overall project implementation and overall E&S performance.

Annex A: Sample Grievance Registration Form

COMPLAINANT DETAILS			
Complainant's name (or name of a representative for complainant/s)			
Complainant's address			
Complainant's telephone number and e-mail address (if available)			
Preferred language/dialect of communication			
Complainant confidentiality	I wish to raise my grievance anonymously		
	I request that my identity is not disclosed to anyone internally except the grievance coordinator handling my case		
I would prefer if the person contacting me is:	Male	female	gender does not matter
GRIEVANCE DETAILS			
Date			
Description of incident			
Severity	One-time incident/grievance (date)		
	Recurring (how many times)		
	Ongoing (currently experiencing problem)		
Complainant's request/proposal to resolve grievance (Please explain what should be done to solve this problem)			
Grievance type (environment, human rights, livelihood, health, legal, property, corruption, GBVSEA/SH)			
Level of damage?	low	medium	high
Additional documentation related to grievance			
Verbal Complaint	If complainant is verbal and in the case that the complainant cannot read or write, the grievance coordinator will help to write it down.		

Annex B: Previous Stakeholder Engagement

Key previous stakeholder engagement	Mogadishu	Garowe	Baidoa and Kismayo	Beledweyne and Dhuusamareeb
Public consultation, workshops, and meetings	SURP I Public consultation on the ESMF/RF with Municipal Council, Ministries and Agencies, UN agencies, CSOs and village elders (May 2016 and March 2017).	SURP I Public consultation on the ESMF/RF with Municipal Council, Ministries and Agencies, UN agencies, CSOs and village elders (May 2016 and January 2017).	SURP II Project start-up consultation (February 2019) involving both the Government stakeholders and community representatives to discuss the roads selections for feasibility studies and engineering designs and to share the plans for project activities implementation.	SURP II AF1 and AF2 SEF, LMP, RFRFRF, and ESMF, update consultations. The stakeholders consulted between 15th April 2021 and 2nd May 2021 include members of community groups such as women, and youth; clan elders; government officials from the two municipalities and Galmudug and Hirshabelle States; vulnerable community members including IDPs, female household heads and the elderly; representatives of international nongovernmental organization and UN agencies.
	SURP I Pre-construction site visits and discussions with the host community (early 2019).	SURP I Pre-construction site visits and discussions with the host community (early 2019).		SURP II: Beledweyne: The PIU team engaged with stakeholders throughout the project. Weekly meetings were held to update on accomplished tasks and plan for the following week. The team maintained open communication with key stakeholders, including the Mayor of Beledweyne, the Minister of Public Works, the Vice President of Hirshabelle State, the PCU counterpart, and the WB TTL. Regular communication ensured prompt resolution of concerns and timely updates on project progress. Additionally, the PIU attended important events such as the ISM Meeting and Mayor Forum in Nairobi to share project developments. (June 2023).

Key previous stakeholder engagement	Mogadishu	Garowe	Baidoa and Kismayo	Beledweyne and Dhuusamareeb
	SURP I Environmental Awareness and consultation workshop with institutional experts for the first subproject in Simad Road in Hamar Jajab District (January 2019).	SURP I Environmental Awareness and consultation workshop with concerned authorities, institutions, and the local residents for the first subproject in Jilab Road in Jilab IDPs camp (March 2019).	SURP II public consultation on the revised ESMF/RF and early draft SEF and LMP (April and May 2019) with a wide range of local stakeholders to introduce, covering a wide range of environmental and social issues including labour and stakeholder engagement.	SURP II: Dhuusamareeb. Engagement of Municipality and Ministry of Public Works to validate the Urban needs assessment priorities. Agreed to start the implementation of these urban needs assessment priorities as soon as possible. (November 2022).
	SURP II Public consultation on the revised ESMF/RF and newly prepared SEF and LMP with district residents, project-affected persons, CSOs, civil servants, UN and project workers (July and August 2019). Issues raised included: project perception, employment, occupational and community health and safety, environment, resettlement and compensation, urban planning and IDPs, stakeholder engagement and GRM (see Annex C for more details).	SURP II Public consultation on the revised ESMF/RF and newly prepared SEF and LMP with government representatives, local private companies, IDPs and vulnerable groups, women and youth groups, host communities, academia, disability association and religious and traditional elders (August 2019). Issues raised included: support to the project and E&S instruments, tree-planting, labour management, and translation of ES instruments (See Annex D for more details).	This was achieved through; One-to-one meetings with the institutional stakeholders involving State Government, Municipality officials, members of the UN organizations and INGOs. Group meetings with the members of public involving traditional elders, business representatives, religious leaders, members of youths, community-based organizations, IDPs and project affected persons.	
	SURP II (July-Sept 2023): Engagement with communities and local administration to address the following. (i) road's design review to correct road level changes and civil work activities work plan; findings of drainage Condition Assessment Report and proposed technical interventions therein, and the proposed resolution of the Grievance associated to the B15 Road.	SURP II: The PIU held one community consultation during the reporting in May 2023. Residents of different SURP II roads participated in the meeting. The purpose and agenda of the meeting was: To update project activities on-going. To recognize community insight of the project and implementation issues. Addressing construction disruptions to the community.	SURP II (August-September 2023): Awareness raising for the GRCs on project E&S safeguards requirements. GRCs were updated on project progress, improved awareness on general project E&S safeguards requirements with emphasis given on OHS, community safety, prevention of child labour and GBV, GM and waste management; engaging police on road safety, and local community leaders to promote proper disposal of community waste, provide local communities updates on the project progress, and community	

Key previous stakeholder engagement	Mogadishu	Garowe	Baidoa and Kismayo	Beledweyne and Dhuusamareeb
			responsibilities to safeguard the newly constructed roads, and raise awareness on the project GM.	
	SURP II: Stakeholders' consultation on prioritization of package one investment roads. Confirm that the proposed subprojects are supported by stakeholders, particular by the local communities before starting the preparation of the Project. (March 2023).	SURP II: Consultation during project implementation as follows. Wadajir community engagement for the upcoming package II. Continue community involvement in Halgan for trees protection and updates for road junctions' access. Informed community on project activities. Shared channels for reporting and informing and GM procedures. GBV/SEAH awareness and prevention tips on project. (December 2022).	SURP II: Kismayo: 4th May 2023 and Ended on 8th May 2023. Local communities, organizations, and businesses situated near the roads were sensitized regarding the imminent asphalt work. The campaign proved to be successful in effectively conveying essential messages, particularly emphasizing the hazards associated with asphalt construction. This proactive approach greatly assisted the community in avoiding inconvenience and potential damage to their properties. Moreover, community awareness demonstrated its efficacy by successfully engaging with the residents and ensuring that they were well-informed about the upcoming road closure due to asphalt work.	
	SURP II: Consultation with the community groups on BRA investment prioritization on trunk drainage. Consultation with the Local Authorities (District, BRA leadership and departments) and the federal government on the prioritization of BRA investment in trunk drainage. Confirm that the proposed 4 trunk drainage lines are supported by the different stakeholders, in particular by the local		SURP II: Baidoa. To provide the public correct information about project progress and to hear and respond to their concerns. Specifically, update the public on project progress, clear public misconceptions about the project, create awareness and provide feedback. (May -June 2022). SURP II: The community consultation to give the community update of the project, safety of the environment and	

Key previous stakeholder engagement	Mogadishu	Garowe	Baidoa and Kismayo	Beledweyne and Dhuusamareeb
	communities before starting the preparation of the Project. To confirm the commitment of Local Authorities (District, BRA leadership and departments) on the proposed 4 trunk drainage lines. Meaningful and structured engagement with relevant ministries in all aspects of the project from project design and throughout the project cycle is needed. Consultation with the community groups on BRA quick wins investment prioritization on catchment ponds and B20 and B15 November 2021, February 2022 and (August-September 2022).		also community job creation for women, IDP and youth. Working together with clean E environment, healthier and beautiful city. Social- Improved livelihood for women, IDP and youth Waste managed. Environmental health and safety GBV /SEAH and child labour Project progress and challenges. Hearing the public's concerns and feedback. Public knowledge of GRC and Environmental health and safety. (May -June 2023).	
Information disclosure	The summary of ESMF and RF for SURP I and the translation in Mogadishu and WB website (June 2018).	The summary of ESMF and RF for SURP I and the translation in Garowe and WB website (June 2018).	Key project information on SURP II including ESMF, RF, LMP and SEF was shared with stakeholders during the consultation events as presented above (April and May 2019).	Disclosure of integrated E&S instruments (ESMP, SEP, SMP, and LMP) concluded, by engaging communities, local -authorities, heads of zones, and posting in areas accessible to the community. (June 2023).
	The specific ESMP and RAP for the first SURP I subproject disclosed through local newspaper, BRA and District HQ notice boards and social media (January to March 2019).	The specific ESMP and ARAP for the first SURP I subproject through local newspaper, website, Garowe Municipality HQ notice boards and public gathering places (December 2018 to February 2019).		
	The summary translation of SURP II ESMF, RF, LMP and SEF (July and August 2019).	The summary translation of SURP II ESMF, RF, LMP and SEF (July and August 2019).		

Key previous stakeholder engagement	Mogadishu	Garowe	Baidoa and Kismayo	Beledweyne and Dhuusamareeb
Grievance Management	Under SURP I, Grievance Redress Committees (GRCs) have been established in 7 project districts in Mogadishu. Database and registration books for grievance records are in place in each GRC. Trained the GRC on grievance Redress Mechanism. Selected GBV/SEA/SH focal points to each (GRC). Activated a toll-free number and email for reporting grievances, including GBV/SEA/SH cases.	Under SURP I, a GRC has been established in Garowe Municipality. Grievance recording, and handling mechanism are in place. Trained the GRC on grievance mechanism. Selected GBV/SEA/SH focal points to each (GRC). Activated a toll-free number and email for reporting grievances, including GBV/SEA/SH cases.	SURP II: GRCs established in Baidoa Kismayo, Beledweyne and Dhuusamareeb. Trained the GRC on grievance Mechanism. Selected GBV/SEA/SH focal points to each (GRC). Activated a toll-free number an email for reporting grievances, including GBV/SEA/SH cases.	

Annex C: Stakeholders Consulted

No	Names	Contacts
1	Mohamed Yusuf Kulmiye Haredhere District Commissioner (DC)	+252 615 72 72 93 mohamedyuusof93@gmail.com
2	Abdirahman Mumin Ahmed Peace and Development Action (PDA)	+252 616 397 980 abdi.mumin@pda.org.so
3	Mohamed Abdullahi Hassan Programe Director, Mandhere Relief and Development Organization MARDO	+252 615 55 77 99 mardosom@gmail.com
4	Khadra Abdi Osman Chairlady - Harardheere Women Group	+252 613 685 886
5	Mohamed J. Aden Action for Rural Education and Agriculture Solutions (AREAS) Programs Director	+25499 957 522 / +252 616 732 020 dhumagyare965@gmail.com areas.field@gmail.com info@areas.org.so
6	Hassan Hashi Awale Sustainable Development Solutions (SDS)	+252 617 63 11 63 awale114@gmail.com
7	Madam Idil Office of the Prime Minister (OPM)	+254 721 111525

Annex D: Summary of Consultations with Key Stakeholders

No	Stakeholder Consulted	Main remarks
1	Mohamed Yusuf Kulmiye Haredhere District Commissioner (DC) +252 615 72 72 93 mohamedyuusof93@gmail.com	<ul style="list-style-type: none"> • Most infrastructure in town destroyed by recent flooding (with some roads cut-off). • Main road connecting Haredhere and Mogadishu is critical for goods and service delivery. • Town has no dumpsite designated. • Investment needed to improve the sanitation of the town (issues of diseases caused by poor hygiene common). • Town has 3 IDP camps – 2 in town, 1 outside (combined population is approximately 1000 HH). • The new IDP camp has people from most recent clash (black lion fight) areas. • There are very few floodlights in town, yet they are so critical component of town security. • District staff stay for so long without being paid – they need training and stipend to continue working. • There are local NGOs (like PDA, SRC etc.) funded by WFP to provide food and nutrition security related initiatives (provide monthly food rations and cash transfers).
2	Abdirahman Mumin Ahmed Peace and Development Action (PDA)- (Local NGO) +252 616 397 980 abdi.mumin@pda.org.so	<ul style="list-style-type: none"> • Waste management in town very poor, with littering common along major roads. • There are two market spaces in the town and only one of them is operating. • The market works on daily basis despite the respect of Friday as public holiday but those who wish can still have their business open and running on Fridays. • Currently, no one collect taxes from the markets. • Haredhere town has 3 health facilities, with Haredhere General Hospital (located at the centre of the town) being the main hospital. • Main water source is from boreholes, majority of households go to fetch the water from the water sources • There are one primary and secondary schools in town (both governments run). Both are days schools with very dilapidated facility.
3	Mohamed Abdullahi Hassan Programme Director, Mandhere Relief and Development Organization MARDO (Local NGO) +252 615 55 77 99 mardosom@gmail.com	<ul style="list-style-type: none"> • Key priority areas for Adan Yabaal and Haredhere towns are: <ul style="list-style-type: none"> ❖ health and nutrition; ❖ education ❖ clean water; ❖ food security and livelihoods. • It is common to have people who are 18 years who have never received even a single vaccination. • Most common water sources are from unprotected shallow wells. • Main source of electricity is from diesel powered generators, operated by private businesspeople. • Previously, levies were collected by District Council nominated by AS.

		<ul style="list-style-type: none"> • There are about 800-1,000 school going children in the towns. • Most land in the two towns are public lands. • Towns consume food imported from other areas. • UNICEF provides emergency mobile clinics.
4	<p>Khadra Abdi Osman Chairlady - Harardheere Women Group +252 613 685 886</p>	<ul style="list-style-type: none"> • Khadra is a previous IDP (belonged to the IDP camp in town) but now integrated into the society. • She left Elnur village 1 year due to fighting (she lived with her parents and a brother). The brother was wounded. The brother and parent moved to Mogadishu; she moved Haredhere town to look for work. • IDPs are in 2 groups: new arrivals and those who have stayed for long. The women group supports vulnerable person whenever there is conflict. • They specifically help new arrivals (IDPs) to the camps. • They are do women empowerment, by inviting and/or representing women in discussion forum. • Critical requirements at the IDP Camps are: <ul style="list-style-type: none"> ❖ Food; ❖ Water; and ❖ Security (against GBV). • New arrivals face a lot of GBV cases, with reports of rape very common (though rare, sometimes there are rumors of forced FGM). • No gender separation at the IDP camps (but majority of those at the camp are women and children). (Absence of male relatives increases women's vulnerability since they feel there are no men to defend them against GBV). • Of the 3 IDP camps, the two camps in town have some electricity, the one outside town does not have. • There are humanitarian organizations which support the camps with relief food. • Most (almost all) IDP kids do not go to school. • Water in town (including by IDPs) is sourced at about 0.7 USD per 20L jerrican (in most cases, the cost goes up when one has to pay donkey carts to transport it to the house).
5	<p>Mohamed J. Aden Action for Rural Education and Agriculture Solutions (AREAS) Programs Director +25499 957 522 / +252 616 732 020 dhumagyare965@gmail.com areas.field@gmail.com info@areas.org.so</p>	<ul style="list-style-type: none"> • Provided contacts of (and introduced) to the Haredhere DC. • Also provided contact of a local youth (Abdirahman +254 796 288 023) affiliated with a local NGO in Galmudug called AYAAN. • Provided a document with general overview of Adan Yabaal town (summarized as follows): <ul style="list-style-type: none"> ❖ Adan Yabaal is isolated from the other key administrative and population centres in Middle Shabelle because of the lack of functional transportation infrastructure. ❖ There is no airstrip in Adan Yabaal. ❖ Adan Yabaal District Hospital has 2 wards, one for the military and one for civilians.

		<ul style="list-style-type: none"> ❖ A SNA generator currently provides electricity in the hospital (2 – 3 hours a day). ❖ The hospital sees 60-80 patients a day. It is supported by Aid Vision. ❖ There is no ambulance in the town or District. ❖ The primary school is the only school in Adan Yabaal. The secondary school was apparently destroyed by AS.
6	Hassan Hashi Awale Sustainable Development Solutions (SDS) +252 617 63 11 63 awale114@gmail.com	<ul style="list-style-type: none"> • Introduced by Isse Ibrahim Mohammed of the same organization (SDS). • Hassan provided a generalized overview of the two towns but, upon request, has agreed to share detailed information about Adan Yabaal by Friday 15 Dec 2023.
7	Madam Idil Office of the Prime Minister (OPM) +254 721 111525	<ul style="list-style-type: none"> • Adan Yabaal is inhabited by the Abgaal community (Owbakar clan). • The district administrator is Ali Omar (+252 615 147 617). • Adan Yabaal is where the AS had their regional headquarters (housing regional administration, high court, and residence for their provincial leaders). • In the early days of the military offensive, Al-Shabaab destroyed key community infrastructures like boreholes, Telcom masts and Government installations. • One primary school operation, one secondary school building exists but not working, no payment for teachers. • Main Hospital exist but not operational. Private MCH and pharmaceuticals exist. • Court building exist but not fully operational. Judicial officers deployed from Mogadishu on need basis. • Two boreholes exist both functional.

Annex E: Summary of AF3 Consultations

State	Selected Priorities under AF 3	Perception of the Project	Benefits of the Project
Mogadishu (BRA)	Agreeable to beneficiaries .	<p>Most of the comments were linked to lack of large scale highly visible investments, comparisons were made with other cities such as Garowe and Baidoa.</p> <ul style="list-style-type: none"> “It has benefited other cities more than Mogadishu.” “We have not taken advantage of the Project as we should have.” “We had some community roads under SURP-I, we haven’t seen much since then.” 	<ul style="list-style-type: none"> “In a very small way compared to other cities.” “The water retention ponds minimized flooding.”
Garowe (Puntland State)		<p>Participants from Garowe were generally very happy with the Project expressing satisfaction With the outcome. Comments include:</p> <ul style="list-style-type: none"> “Garowe looks different, we have tarmac roads now, very beautiful.” “This Project has led to the increase in the value of our properties.” “I use a wheelchair, before it was very hard to ride on the rough road to Jilbab, I ride comfortably now.” 	<ul style="list-style-type: none"> “The city has become beautiful, Garowe is a proper city now.”
Kismayo (Jubaland State)		<p>Satisfaction with how the city had changed was expressed along with improvements in Mobility. For example:</p> <ul style="list-style-type: none"> “It has changed how the city looks and what the public thinks of the government, the people are our friends now” “This city is very different now, if we keep heading in this direction Kismayo will become as beautiful as Mombasa in Kenya” “My right leg was cut after an accident, it is much easier to move now, it would have been much better if the roads had lights” “I have two houses, my house on the outskirts, towards the quarry area I had stopped being there 	<ul style="list-style-type: none"> “City had only one tarmac road, now there are so many. “Connectivity, and security have improved.” “I think one of the most important things is how the Argo outfall prevented the city from flooding, we are very pleased with this.”

State	Selected Priorities under AF 3	Perception of the Project	Benefits of the Project
		frequently before the road was built, now I spend three to four days a week in that house. This Project is a big success”	
Baidoa		Two main issues were raised, how the roads had changed the city aesthetically, and how the roads had reduced flood related risks to the community. For example: <ul style="list-style-type: none"> “This Project has enormously benefited the people of Baidoa, these roads and the drainage made many people safe during the recent rains that inundated the city. Baidoa also looks more beautiful” 	<ul style="list-style-type: none"> “The roads saved the city from the recent El-Nino floods. If the roads and the bridge were not there some parts of the city would have been washed away.” “... and of course, the city looks good, we have young people doing Tik-Tok videos in the new roads.”
Beledweyne (Hirshabele State)		In Beledweyne no civil works has taken place, participants could not say much. For instance: <ul style="list-style-type: none"> “A lot has been said about the Project, but we have nothing to say for now until we see what is built.” 	<ul style="list-style-type: none"> “We hope to see benefits after they build the roads and bridges we identified.”
Dhuusamareeb (Galmudug State)		Same as Beledweyne, civil works have also not commenced in Dhuusamareeb, people felt they had not much to say about the project. For example: <ul style="list-style-type: none"> “We will wait and see how it works for us.” 	<ul style="list-style-type: none"> “Nothing so far, but Inshaallah, I’m sure we will have positive outcomes like Garowe. ”
2. Federal and Local Governments			
	Selected Priorities under AF 3	Implementation Arrangements Perceptions	Funds Allocation
Federal Government	Agreeable to federal and local leadership.	Generally, Federal government officials indicate they should have a bigger role in the Project, comments include: <ul style="list-style-type: none"> “The federal government has no control over the Project.” “All the procurement is done by the municipalities.” “This is a big Project should be fully managed by the federal government; coordination is not enough.” 	Federal government officials pointed out they should be responsible for allocating the funds to the municipalities since they know the needs of the people. They also indicated areas newly liberated from Al Shabab should be considered for investment. The need for fairness was also emphasized pointing out because a city has used up all its allocation on time should not lead to overlooking the actual more pressing needs of other cities such as Mogadishu. Comments included: <ul style="list-style-type: none"> The allocation of funds should be left for us. We are the ones who can tell what the priorities are. Newly liberated areas should be considered; this is important for government visibility.

State	Selected Priorities under AF 3	Perception of the Project	Benefits of the Project
			<ul style="list-style-type: none"> • New cities of Beledweyne and Dhuusamareeb should be prioritized. • Having a clear formula is important, but we have to be fair.
State Government		<p>The state governments are of the opinion that both the federal and municipal level of governments are running the project through the PIU and PCU, but they have been left out indicating they want to be more involved in the Project. For example, they pointed out:</p> <ul style="list-style-type: none"> • “The federal member states have not been involved in this Project.” • “The only time we get involved is during the steering committee meeting, which is very rare.” • “There has to be a role for the FMS, we cannot remain as spectators.” • The federal member states can help with supervision. 	<p>The state governments mentioned aspects that were important for them indicating they should be considered. For example:</p> <p>Benadir Regional Administration (BRA)</p> <ul style="list-style-type: none"> • “We should not be penalized for not spending the money allocated to us, Mogadishu is a difficult environment to work. This is the largest and most populated city; these should be considered.” <p>Puntland State</p> <ul style="list-style-type: none"> • “We have our roads built on time, very beautiful roads, we need to have this acknowledged.” <p>Jubaland State</p> <ul style="list-style-type: none"> • “Kismayo city is growing very fast, this should be considered.” <p>Southwest State</p> <ul style="list-style-type: none"> • “Baidoa is a growing city that receives many people each year as IDPs, the roads have been built, these things should be considered.” <p>Hirshabele State</p> <ul style="list-style-type: none"> • “Hirshabele has a lot of challenges, Beledweyne is affected by extreme floods, this is very different from the other cities, you need to consider this factor.” <p>Galmudug State</p> <ul style="list-style-type: none"> • “We want to be treated fairly.”
Municipalities		<p>The municipalities emphasized on the nature of the Project and agreed upon implementation arrangement indicating the State and Federal governments should understand this aspect. Comments include:</p> <ul style="list-style-type: none"> • The current arrangement is what is behind the success of the Project. • Municipalities are the closest level of government to the people; this is where service should be delivered • “FMS Ministries of Public Works always complain of not being involved in the Project, but the reality is 	<p>The Municipal governments were more precise in expressing how they wanted the allocation to be addressed mentioning aspects that were either advantageous or disadvantageous for them. For instance:</p> <p>Mogadishu Municipality</p> <ul style="list-style-type: none"> • Mogadishu municipality and BRA are the same entity, above comments apply. <p>Garowe Municipality</p> <ul style="list-style-type: none"> • “Performance should be a criterion, we should be judged by how we have managed to complete the work on time, this should be an important criterion.” <p>Kismayo Municipality</p>

State	Selected Priorities under AF 3	Perception of the Project	Benefits of the Project
		<p>they don't have the capacity. The project is training their engineers."</p> <ul style="list-style-type: none"> • "If the FMS MPWR&H have issues they should bring it up with the FMS president who has appointed both the Mayor and the Minister." • "The Ministries need to understand this is a Municipal government project, every new minister has to be made to understand this very clearly." 	<ul style="list-style-type: none"> • "We are ready for implementation, we even have the designs for roads previously selected by the community, this should be considered as a criterion" we don't like vulnerability criteria because we are unfairly judged in this, that is why we have not been included in the informal settlement project." <p>Baidoa Municipality</p> <ul style="list-style-type: none"> • "Vulnerability is an important aspect, Baidoa has a lot of IDPs, now we have flooding issues, vulnerability should be weighted accordingly." <p>Beledweyne Municipality</p> <ul style="list-style-type: none"> • "We are new compared to the other cities; this should not be a disadvantage for us." <p>Dhuusamareeb Municipality</p> <ul style="list-style-type: none"> • "Having joined the project late we don't have much to show for, but our needs are clear."

HARGEISA AF4 CONSULTATIONS SUMMARY

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. 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. Twelve (12) consultations were held in Hargeisa from March 3-11, 2025.

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 Displacement and Resettlement

- 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.

- 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 (VLD).
- 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 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. 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.
- 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. Additionally, it will link these districts to the central district, improving access to essential services such as businesses, healthcare, and education. 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

1) Maxamuud Haybe sub-district					
	Road Name	District	Length	Estimated Cost (USD)	Justification provided by the community, civil society and the local government
					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. 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.
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	This culvert provides access to the primary school in the neighbourhood, making it essential for students and the community. 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.
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	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	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. 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. 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.

1) Maxamuud Haybe sub-district					
	Road Name	District	Length	Estimated Cost (USD)	Justification provided by the community, civil society and the local government
4) Koodbuur District					
	Road Name	District	Dimension	Construction Cost	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> <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					

1) Maxamuud Haybe sub-district					
	Road Name	District	Length	Estimated Cost (USD)	Justification provided by the community, civil society and the local government
	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				<p>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 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	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 these challenges. Improving this road is crucial

1) Maxamuud Haybe sub-district						
	Road Name	District		Length	Estimated Cost (USD)	Justification provided by the community, civil society and the local government
						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 helps	

9) Axmed Dhagax sub-district					
	Road Name	District	Dimension	Construction Cost	Justification provided by the community, civil society and the local government
					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.