



HARGEISA LOCAL GOVERNMENT

GOVERNMENT OF SOMALILAND

SOMALIA URBAN RESILIENCE PROJECT (SURP II-P170922)

NAGAAD PROJECT

ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK (ESMF)

Originally Prepared for SURP II (July 2019)

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SURP II Fourth Additional Financing in August 2025

August 2025

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ABBREVIATIONS AND ACRONYMS

1. AF4 Fourth Additional Financing
2. AF3 Third Additional Financing (used interchangeably with TAF, see below)
3. AfDB African Development Bank
4. BRA Benadir Regional Administration, (BRA)
5. CEO Community Engagement Officers
6. CERC Contingent Emergency Response Component
7. C-ESMP Contractor's Environmental and Social Management Plan
8. CITES Convention on Trade in Endangered Species
9. CR Critically Endangered
10. CSO Civil Society Organizations
11. DECC Directorate of Environment and Climate Change
12. E&S Environment and Social
13. EHS Environment, Health and Safety
14. EN Endangered
15. ESC Engineering and Supervising Consultant.
16. ESCP Environmental and Social Commitment Plan
17. ESF Environmental and Social Framework
18. ESIA Environmental and Social Impact Assessment
19. ESMP Environmental and Social Management Plans
20. ESS Environment and Social Standards
21. ESS1 Environmental and Social Standard
22. FGM/C Female genital mutilation/cutting
23. FGS Federal Government of Somalia
24. FMS Federal Member State
25. GBV Gender-Based Violence
26. GCF Green Climate Fund
27. GDP Gross Domestic Product
28. GEF Global Environment Facility
29. GM Grievance Mechanisms
30. GRC Grievance Redress Committee
31. GRS World Bank Corporate Grievance Redress Service
32. HIPC Heavily Indebted Poor Countries
33. HLG Hargeisa Local Government
34. HLP Housing, Land and Property
35. IDA International Development Association
36. IDP Internally Displaced Persons (IDPs)
37. IMF International Monetary Fund (IMF)
38. INGOs International non-government organizations
39. IOM International Organization for Migration (IOM)
40. IPF Investment Project Financing (IPF).
41. LMP Labour Management Procedures (LMP),
42. MDAS Ministries, Departments And Agencies (MDAs)

43. MoE&CC Ministries of Environment and Climate Change
44. MoERCC Ministry of Environment, Range and Climate Change
45. MoF Ministry of Finance
46. MoHADM Ministry of Humanitarian Affairs and Disaster Management
47. MoPIED Ministry of Planning, Investment and Economic Development
48. NBS Nature-Based Solutions
49. NGOs Non-Governmental Organization
50. OECD Organization for Economic Co-operation and Development
51. OESRC Operations Environmental and Social Review Committee
52. OHS Occupational Health and Safety
53. OPM Office of the Prime Minister
54. PAPs Project-Affected Persons
55. PCU Project Coordination Unit
56. PDO Project Development Objective
57. PET Potential Evapotranspiration
58. PIU Project Implementation Units
59. PPP Polluter Pay Principle
60. PWDs persons with disabilities
61. RAPs Resettlement Action Plans
62. RPF Resettlement Policy Framework
63. SEA/SH Sexual Exploitation, Abuse and Harassment
64. SEF Stakeholder Engagement Framework
65. SMPs Security Management Plans
66. TA Technical Assistance
67. TAF Third Additional Financing
68. ToR Terms of References
69. TPM Third-Party Monitor
70. UN United Nations
71. UNDP United Nations Development Program
72. UNOPS United Nations Office for Project Services
73. WB World Bank
74. WBG World Bank Group

EXECUTIVE SUMMARY

Background to the project. Urban infrastructure and capacities in Somalia are under considerable pressure, and urban spaces are limited and contested. Many city dwellers lack adequate urban services, community and economic infrastructure, livelihood and employment opportunities, education, and appropriate, durable housing solutions.

The situation is no different in Somaliland where key stakeholders consulted during project preparation (see section on stakeholder engagement below) revealed that the City of Hargeisa currently experiences a number of infrastructure related challenges. These deficits include inadequate water supply and sanitation services, poor drainage system causing frequent flooding during the rainy season and poor road network with rough and unpaved roads creating significant mobility challenges. These conditions have particularly severe consequences for pregnant women, the elderly, and individuals with health conditions who struggle with transportation on these rough roads.

To partly address the gaping urban infrastructure deficit, the World Bank (WB) has been supporting the Federal Government of Somalia (FGS) in dealing with urban infrastructure challenges since 2016 through various projects including the Somalia Urban Investment Planning Project (SUIPP) P150374, SUIPP AF (P166591), and the Somalia Urban Resilience Project (SURP) P163857. The SURP (approved in August 2018 and closed in September 2021) project targeted the improvement of urban infrastructure and strengthening governance in the municipalities of Mogadishu in the Benadir Regional Administration, (BRA) and Garowe in Puntland State. SURP was the first WB project in Somalia to provide infrastructure financing for urban roads and drainage investments, directly to local governments. The second phase of the project, SURP II¹ (P1170992) scaled up project activities to include the municipalities of Baidoa (South West State) and Kismayo (Jubaland State). With successful implementation, SURP II was further expanded to include two more municipalities, Beledweyne in Hirshabelle State and Dhuusamareeb in Galmudug State. These six municipalities were selected based on their political, economic, and security relevance as well as their vulnerability aspects.

SURP II uses Public Financial Management (PFM) systems to strengthen municipal governance and deliver infrastructure and services through subnational government systems. The project aims to strengthen the resilience of cities by building the capacity of municipalities, financing investments in priority urban infrastructure or services, and providing short-term income generation opportunities particularly for the urban poor and Internally Displaced Persons (IDPs) through labour-intensive works. In addition to the original grant of US\$112 million approved on December 19, 2019, SURP II has thus far benefited from three Additional Financings (AFs): i) SURP II AF1 (P178887) USD 41.5

¹ In May 2023 SURP-II was given a Somali name *Nagaad*, alluding to “prosperous settlement” in the Somali language. In other project documents and E&S frameworks and city specific plans the name Nagaad is also used.

million, ii) SURP AF2 (P179775) USD50 million, and iii) SURP II AF3 (P181512) USD50 million. Taken together, SURP-II has a total budget envelope of USD 253.5 million, with a current closing date of December 31, 2026. The project is seeking a fourth additional financing (AF4) of USD 25 million to scale up project activities to include Hargeisa City in Somaliland where similar infrastructural challenges are experienced. The project is also seeking to extend the closing date to December 2028.

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

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

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

- **Component 1, Urban Infrastructure and Services (USD 108 million):** Supports the preparation and implementation of all eligible infrastructure, financing specifically the following activities: (i) technical studies, engineering designs and bidding documents for priority investments; (ii) environment and social (E&S) due diligence work; (iii) institutional assessments of implementing agencies and (iii) any other necessary analytical work. Component 1 also finances investments in Urban Infrastructure and Services, civil works, goods, and construction supervision consultancies for investments, prioritized by the government and community members, that meet the pre-determined selection criteria.
- **Component 2, Institutional Strengthening and Analytics (USD2 million):** Supports various technical assistance (TA) and related analytics, such as on informal

settlements, climate resilient operation and maintenance of urban infrastructure, and urban governance, including solid waste management.

- **Component 3, Project Management and Capacity Building (USD 28.5 million):** Finances the overall project management costs, including monitoring and evaluation, as well as capacity strengthening for the PCU, PIUs, and relevant government staff.

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

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

The AF4 builds on the existing institutional structures of SURP II to capacitate functional coordination between the state, federal, and municipal levels of governmental agencies and beneficiary communities.

Project development objective (PDO). The PDO 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”.

Current project status. As of June 2025, cumulative disbursement is US\$132 million, 53.8 percent of the total US\$253.5 million grant. Progress towards achievement of PDO and Overall Implementation Progress are rated Satisfactory (S). The project has maintained both ratings above Moderately Satisfactory for the past 12 months. Despite operating in a complex environment, the project is successfully being implemented in six strategic cities.

Achievements to date. The project has to date reached 494,910 beneficiaries, rehabilitated 35km of urban roads and side drainage, employed a total of 4747 persons in skilled and unskilled labour activities, including 753 women, 933 internally-displaced persons (IDPs), and 28 persons with disabilities (PWDs). Additionally, 73 individuals participated in internships and on-the-job training, 86 municipal staff have been trained across six participating cities and stakeholder consultations and awareness-raising efforts have reached 13,064 individuals. Also, 98% (318) of the 322 reported grievances have been resolved. Drought response activities, including cash transfer, water and sanitation facilities, and temporary housing, land, and property (HLP), funded under the now closed Component IV, were successfully completed in September 2024, providing life-saving assistance to more than

1 million people. 2 SURP-II has already helped define intergovernmental functional roles and responsibilities related to urban services. With relatively strong implementation arrangements and broad geographic coverage, SURP-II has further evolved to support cities on resilient service delivery beyond city infrastructure, 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.

Environmental and Social Management Framework (ESMF). The main objective of this ESMF updated for AF4, is to enhance and strengthen the guidelines and procedures for assessing and mitigating potential negative E&S risks and impacts as set out in the original ESMF and its first updated iteration, while also highlighting the lessons learnt and how these will be applied to the new AF4 interventions. The ESMF lays out the principles, guidelines and procedures for the E&S screening and assessment and E&S risk mitigation and management of all activities funded by the project.

The ESMF seeks to ensure that the project activities are compliant with the relevant requirements of the national and municipal policies, regulations, and legislations as well as the WB Environment and Social Framework (ESF). The updated ESMF will be disclosed in July 2025 after clearance by the World Bank. This ESMF also provides guidance for the conduct of other related E&S risk management instruments, including Stakeholder Engagement Framework (SEF) and Labour Management Procedures (LMP), in addition to the municipality-specific Security Management Plans (SMPs). The ESMF is to be implemented in conjunction with the requirements and obligations spelt out under the project's Environmental and Social Commitment Plan (ESCP). The typology of subprojects to be supported under AF 4 include roads, solar lighting and drainage works. For complex sub-projects, where an Environmental and Social Impact Assessment (ESIA) is required, Annex 3 provides guidance to the PIU for the development of the necessary terms of references (TORs).

In general, determining the need for an ESIA is guided by the ESF and particularly Environmental and Social Standard 1 (ESS1): Assessment and Management of Environmental and Social Risks and Impacts. An ESIA is required when a project poses significant environmental or social risks that need detailed assessment to ensure that all potential risks and impacts are identified and adequately mitigated. The ESIA process also helps in defining the measures needed for compliance with the WB's ESF and national regulations.

² 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.

Relevant Environmental and Social Standards (ESSs). E&S risks in the project are managed using the WB's ESF and its relevant ESSs. The ESF supports green, resilient, and inclusive development by strengthening protections for people and the environment and making important advances in areas such as labour, inclusion and non-discrimination, gender, climate change, biodiversity, community health and safety, and stakeholder engagement. The ESF uses a risk-based and proportionate approach that applies increased oversight and resources to complex projects and allows for greater responsiveness to changes in project circumstances through adaptive risk management and stakeholder engagement. The ESF promotes integrated E&S risk management and places an emphasis on strengthening national E&S management systems and institutions, and supporting state capacity building. It promotes enhanced transparency and stakeholder engagement through timely information disclosure, meaningful and ongoing consultations throughout the project life cycle, and responsive grievance mechanisms to facilitate resolution of concerns and grievances of project-affected persons (PAPs).

The overall E&S risk rating for the SURP II AF4 is “High” under World Bank's Environmental and Social Risk Classification (ESRC) system. Out of the ten ESSs, eight are relevant to SURP II parent project and the four AFs, as follows:

- ESS1: Assessment and Management of Environmental and Social Risks and Impacts;
- ESS2: Labour and Working Conditions;
- ESS3: Resource Efficiency and Pollution Prevention and Management;
- ESS4: Community Health and Safety;
- ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement;
- ESS6: Biodiversity and Sustainable Management of Living Natural Resources;
- ESS8: Cultural Heritage; and
- ESS10: Stakeholder Engagement and Information Disclosure.

Anticipated environmental risks

There are risks associated with the construction of civil infrastructure, including risks related to habitat degradation, and cumulative environmental impacts that need to be carefully managed and mitigated. Substantial Environment rating is due to the nature and scale of civil works in an urban environment. Potential environmental risks and impacts are mainly related to water, soil, and air pollution, waste and hazardous materials management, occupational health and safety (OHS), and community health and safety. These may include: (i) alteration of air quality by dust and emissions during construction of various infrastructure; (ii) nuisance due to noise and vibration from moving of work vehicles and machinery; (iii) contamination of soil and surface water by accidental spills of lubricants, oils and suspended solids; (iv) soil erosion due to clearance and excavation works; (v) risk of accidents and incidents due to construction materials supply, the transport of equipment, workers transportation; (vi) risk of flooding during the two rainy seasons experienced in project cities; (vii) exposure to high temperature fluctuations; (viii) traffic interruptions including blocking of access paths; and (ix) micro climatic variations due to increases in impermeable surface area.

Anticipated social risks. The Social risk rating is High. The identified social risks and which apply to components 1, 2 and 3 include the contextual security risks, clan dynamics and the resulting resource-allocation conflicts; sexual exploitation, abuse, harassment (SEA/SH), and other forms of GBV; gender biases and prejudices against women engaging in construction-related jobs; Hargeisa Municipality's lack of prior experience implementing World Bank-funded projects or the ESF and the related ten ESSs; potential impacts on land and livelihoods and lack of a clear framework on compensating PAPs who are physically and/or economically impacted; labour influx emanating from Technical Assistance (TA) and civil works contractors; exposure of project workers to discrimination due to, e.g., nepotism and elite capture, non-adherence to contract terms, occupational health and safety (OHS) hazards associated with social investments, standard office work, and insecurity risks; exclusion of disadvantaged groups including women, internally displaced persons (IDPs), PWDs and youth from the stakeholder engagement process and access to project information and benefits.

In addition, reputational risks are foreseen from how the PIU and other implementing entities may subsequently apply or fail to apply the TA provisions. The PIU shall assess and mitigate the social risks and related impacts consistent with the ESF requirements. The PIU shall engage qualified and experienced Environmental and Social Specialist and GBV-SEA/SH Specialist within 90 days after project effective date. Further, the parameters for TA defined in the ESCP, and the Terms of Reference (ToRs) for the TA activities shall be consistent with the World Bank's Operations Environmental and Social Review Committee (OESRC) Advisory Note on TA and the ESF of 2019 and the policies subjected to public participation.

The technical assistance to support priority urban analytics for Hargeisa. is not expected to have adverse risks and impacts. However, during implementation, fieldwork activities related to data collection and site travel may result in limited labour influx from TA service providers and related impacts such as sexual exploitation and abuse or sexual harassment (SEA/SEAH), and the potential exclusion of disadvantaged or vulnerable individuals and groups from TA activities. Further, the output of such TA activities, such as policy advice, analytics, and pilot projects for government authorities, may have adverse E&S implications, particularly significant reputational risks depending on how the government subsequently applies or potentially fails to apply the TA advice.

Environmental and social instruments. Several E&S instruments have already been prepared for the previous iterations of the project, and the project's performance on the implementation of these E&S instruments is on track. Similarly, the AF3 E&S instruments have been updated to align with the AF4. In addition to the six cities, the PCU will audit E&S compliance in Hargeisa and the Bank's E&S team will actively participate in the project's twice yearly Implementation Supervision Missions (ISMs). Mitigation measures will entail the implementation of E&S risk management instruments as required by the ESF and will largely follow the patterns established under SURP II thus far. Short-term and site-specific E&S risks for subprojects under the AF4 will be first identified by way of screening and scoping during

the initial due diligence phase when preparing subprojects. This will be further buttressed by identifying context-relevant mitigation measures, standard operating procedures, and good construction management practices. Some of the specific mitigation measures to address social risks include tapping to local workforce to minimize influx of labour, and all contractors and workers signing and understanding a contractor and worker code of conduct respectively, collaboration with local communities and GBV-related service providers mapped under the project; preparation and implementation of Resettlement Action Plans (RAPs) and Labour Management Procedures (LMP), inclusion of disadvantaged and vulnerable groups in project-related job and upskilling opportunities; and effective stakeholder engagement, including inclusive and transparent consultation process and functional Grievance Mechanisms (GMs). The implementation of these measures shall be monitored and reported biannually to the World Bank throughout the project life.

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

With the support of the Directors for Public Works, and Administration and Finance, the project team undertook stakeholder mapping and analysis leading to the identification of key project stakeholders in Hargeisa. They include directors of departments under the HLG, sub-district government officials and representatives from women and youth organizations, elders, religious leaders, vulnerable community members such as PWDs and IDPs community-based organizations and their umbrella structures.

The preliminary stakeholder consultations were primarily structured around key thematic areas, including stakeholder engagement, grievance management, gender, GBV-SEA/SH, involuntary resettlement, and vulnerable groups. The PIU informed the stakeholders about the project scope, target beneficiaries, timelines, benefits and opportunities, responsibilities, potential project risks and impacts and mitigation measures, institutional/implementation arrangements, and potential investments. A total of 141 stakeholders (106 males and 35 females) were engaged. More details on the consultations are provided in the updated SEF prepared for SURPII AF4.

Grievance Mechanism (GM). The GM is a critical component of SURP II, designed to ensure that grievances from Project-Affected Persons (PAPs) and other stakeholders are addressed in a timely and satisfactory manner. The GM aims to provide a transparent,

accessible, and efficient process for resolving grievances related to project activities. The key components include (a) grievance receipt and registration, with multiple channels for submitting grievances, including in-person, via phone, email, and designated grievance boxes, and with all grievances traditionally logged and documented, (b) grievance assessment and acknowledgment, with the SURP II assessing the validity of the grievance and acknowledging receipt within 7 days, (c) grievance investigation and resolution, a task involving the FMSs-based E&S Specialists, and a resolution proposed and communicated to the complainant within 30 days. The PIU teams have incorporated lessons learned such as the need for diversity in the selection of Grievance Redress Committee (GRC) members and improved accessibility through multiple uptake channels. The same GM will be used for the AF4³. 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. So far, 322 grievances have been reported to the project, with 318 cases closed, and four incidents have been reported (in Kismayo, Mogadishu and Garowe), all of which have been resolved.

Capacity enhancement. Given the novelty of the World Bank's ESF, especially in Somalia and Somaliland, the project will continue to enhance the capacity of the project team including the Hargeisa team, to improve environmental and social performance during project implementation. This will include trainings for PIUs, the contractors and the engineering supervision firm on E&S aspects.

Budget for implementation of this ESMF. The indicative budget reserved to implement the ESMF over the life of the SURP II and the AF (including the AF4) is USD **856,090.40**. The cost for E&S measures to be undertaken at each subproject site will be included in civil works contracts and borne by the contractor. All administrative costs for the operation of the seven PIUs and the central coordinating PCU will be included in the overall SURP II and the AF4 budget. Further details on the disaggregation of these costs are available in **Table 9**.

³ More details of the GM are presented in the updated SEF for the SURP II Fourth Additional Financing.

1. INTRODUCTION AND BACKGROUND

1.1 PROJECT BACKGROUND AND DESCRIPTION

The World Bank has been supporting the Federal Government of Somalia (FGS) in dealing with urban infrastructure challenges since 2016, with funding from the Somalia Multi-Partner Fund (SMPF), through various projects including the Somalia Urban Investment Planning Project (SUIPP) P150374, SUIPP Additional Financing (AF) (P166591), and the Somalia Urban Resilience Project (SURP) P163857. The SURP targeted the improvement of urban infrastructure and strengthening of municipal governance in the municipalities of Mogadishu in the Benadir Regional Administration, (BRA) and Garowe in Puntland State. SURP (approved in August 2018 and closed in September 2021) was the first World Bank project in Somalia to provide infrastructure financing for construction of urban roads and drainage i, directly to local governments.

The second phase of the project, SURPII (P1170992)⁴ scaled up project activities to include the municipalities of Baidoa (South West State) and Kismayo (Jubaland State). With successful implementation, SURPII was further expanded to include two more municipalities, Beledweyne in Hirshabelle State and Dhusamareeb in Galmudug State. These six municipalities were selected based on their political, economic, and security relevance as well as their vulnerability aspects.

In addition to the original grant of US\$112 million approved on December 19, 2019, SURP II has thus far benefited from three AFs: i) SURP II AF1 (P178887) USD 41.5 million, ii) SURP AF2 (P179775) USD50 million, and iii) SURP II AF3 (P181512) USD50 million. Taken together, SURP-II will have a total budget envelope of US\$253.5 million, with a current closing date of December 31, 2026. The project is seeking a fourth additional financing (AF4) of USD 25 million to scale up project activities to include Hargeisa City in Somaliland where similar infrastructural challenges are experienced.

SURP-II (and its AFs) has been given a Somali name, and it is now referred to as the Nagaad Project meaning “prosperous settlement” which better conveys the Project’s objective to the stakeholders. The Project is seeking a fourth Additional Financing (AF4) to scale up project activities in the City of Hargeisa in Somaliland. This Environmental and Social Management Framework (ESMF) was updated for SURP-II Addition Financing 1 (AF1), 2 (AF2) and 3 (AF3). This update is prepared for the AF4.

1.2 Project Development Objective:

Nagaad’s project development objective is to strengthen public service delivery capacity of local governments, increase access to climate-resilient urban infrastructure and services, and to provide immediate and effective response to an eligible crisis or emergency in selected areas.

⁴ In May 2023 SURP-II was given a Somali name *Nagaad*, alluding to “prosperous settlement” in the Somali language. In some of the project E&S frameworks and city specific plans the name Nagaad is also used.

1.3 Current Implementation Arrangements

The Nagaad project is directed by a Steering Committee chaired by the federal Ministry of Public Works Reconstruction and Housing (MPWR&H) with representation of the Office of the Prime Minister (OPM), Ministry of Finance (MOF), Ministry of Planning, Investment and Economic Development (MOPIED) and representatives of participating FMSs. SURP II and its Additional Financing is coordinated by the Project Coordination Unit (PCU) established within the MPWR&H and is implemented by municipal-level Project Implementation Units (PIU) in all the six municipalities with further coordination support from state-level inter-ministerial committees. The implementation arrangements will be adjusted to reflect a new PIU in Hargeisa that will be responsible for procuring investments and for the day-to-day supervision and monitoring. The federal PCU will provide backstopping support and 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.

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

- **Component 1, Urban Infrastructure and Services (USD 108 million):** supports the preparation and implementation of all eligible infrastructure, specifically this component will finance the following activities: (i) technical studies, engineering designs and bidding documents for priority investments; (ii) environment and social due diligence work; (iii) institutional assessments of implementing agencies and (iii) any other necessary analytical work. This component also finances investments in Urban Infrastructure and Services, civil works, goods and construction supervision consultancies for investments, prioritized by the government and community members, that meet the pre-determined selection criteria.
- **Component 2, Institutional Strengthening and Analytics (USD2 million):** Supports various technical assistance and related analytics, such as on informal settlements, climate resilient operation and maintenance of urban infrastructure, and urban governance, including solid waste management.
- **Component 3, Project Management and Capacity Building (USD 28.5 million):** Finances the overall project management costs, including monitoring and evaluation, as well as the capacity building of the PCU, PIUs, and relevant government staff.

1.4 Activities to be financed under AF4

Somaliland, officially known as the Republic of Somaliland is located in the southern coast of the Gulf of Aden and bordered by Djibouti to the northwest, Ethiopia to the south and west, and Somalia to the east. Its claimed territory has an area of 176,120 square kilometers (68,000 sq mi), [7] with approximately 6.2 million people as of 2024. The capital and largest city is Hargeisa. Since 1991, the territory has been governed by democratically elected governments that seek international recognition as the government of the Republic of Somaliland.

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

- a. **Component 1: Urban Infrastructure and Services (US\$175 million).** The allocation will be increased from US\$155 million to US\$175 million, scaling up resilient urban infrastructure and services to include the additional city of Hargeisa. To date, US\$122 million (78%) have been disbursed and committed under this component.⁵The inclusion of Hargeisa will be endorsed by the federal inter-ministerial Project Steering Committee by appraisal. The inclusion of Hargeisa as the second largest urbanized after Mogadishu and the capital of Somaliland, is essential for the project to support investments in climate-resilient urban infrastructure and services, to strengthen local government's service delivery capacity. The project will support similar investments covered by the project, such as roads and pedestrian walkways, solar streetlights, bridges, culverts, roadside drainage, and a PIU office and material testing laboratory⁶, in line with international standards⁷. All investments will have climate-informed engineering designs that account for localized climate projections. It will also prioritize nature-based solutions (NBS), such as native grasses and tree planting alongside roads, which will mitigate drought by reducing the urban heat island effect. The proposed AF4 investments will be finalized using multi-criteria analysis in consultation with communities and stakeholders.⁸
- b. **Component 2: Institutional Strengthening and Analytics (US\$4 million).** The budget allocation will increase from US\$3 million to US\$4 million, to provide additional technical assistance to address critical issues related to urban development in Hargeisa, likely to focus on solid waste management and flood risk management based on initial consultations. This will be further clarified during appraisal.

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

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

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

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

- c. **Component 3: Project Management and Capacity Building (US\$34.5 million).** To cover the government's increased project management costs due to the addition of Hargeisa and the extended project closing date, the budget allocation from the component will increase from US\$30.5 million to US\$34.5 million. It will also increase capacity-building support focused on the municipal level, but now also including state and federal MoPWR&H technical staff, with a focus on strengthening operations and maintenance and strategic supervision.

A summary of the proposed changes under AF4 is presented in **Table 1** below.

Table 1: Summary of Proposed Changes under AF4

Activities	Proposed Changes
Component 1: Urban Infrastructure and Services	Add US\$20 million to scale-up infrastructure investments in Hargeisa. This includes feasibility studies, investments, and civil works supervision.
Component 2: Institutional Strengthening and Analytics	Add US\$1 million to scale-up technical assistance to support priority urban analytics for Hargeisa.
Component 3: Project Management and Capacity building	Add US\$4 million to support the establishment of a new PIU in Hargeisa, continue PCU support through the extended project end date, and include FMS MPWRH in capacity building activities.
Changes to the Results Framework	End Targets to of selected indicators will be changed to reflect the scaled-up activities. Revision of selected intermediate indicators and adding new indicators to reflect the refined project approach.
Changes to closing date of the project	Extend the closing date of the project from December 31, 2026, to December 31, 2028.
Add city level implementing agency for Hargeisa	A new PIU to be established in Hargeisa.

Selection of Infrastructure Investments (“subprojects”): The exact infrastructure investments in Hargeisa will be determined during project implementation. However, eligible urban infrastructure investments need to meet the following criteria which interface the top-down city-wide technical assessment with a bottom-up participatory decision-making process:

- *Critical investments that fill the existing urban infrastructure gaps* as identified by Hargeisa Local Government and citizens and verified in urban infrastructure and service needs assessment.
- *Strategic investments that contribute to urban resilience.* Investments aligned with a broader urban development plan and that directly contribute to making cities more climate resilient.
- *Inclusiveness.* Investments that benefit vulnerable groups including women, youth, the poor, and the displaced and selected in a participatory manner.
- *Maximizing development impact.* Substantive investments should be prioritized over small scale/piece meal investments.

- *Coordination/complementarity with ongoing projects.* Investments should avoid overlap with ongoing development interventions but complement them.
- *Labour intensiveness.* Investments should provide short term income generation opportunities for vulnerable groups especially women and IDPs.
- *Sustainability.* Investments should build in operations and maintenance measures to ensure sustainability.

In addition, all proposed subprojects and their activities will be screened to ensure that they are within the boundaries of the project's eligible activities. The project will not finance activities that:

- have a high probability of causing serious adverse effects to human health and to the environment.
- may adversely affect lands or rights of vulnerable and marginalized groups.
- involve sites with high biodiversity values, or have significantly negative impacts on biodiversity, critical habitats or protected areas.

1.5 Overall Progress of the Project and Implementation Status

Significant milestones have been made in the implementation of the project. Under component 1 critical, highly visible infrastructure have been constructed. As of June 2025, cumulative disbursement is US\$132 million, 53.8 percent of the total US\$253.5 million grant. Progress towards achievement of PDO and Overall Implementation Progress is rated Satisfactory (S). The project has maintained both ratings above Moderately Satisfactory for the past 12 months. Despite operating in a complex operating environment, the project is being implemented in six strategic cities. This includes six municipal PIUs, a federal PCU providing backstopping, coordination, and quality assurance, and inter-ministerial project steering committees at state and federal levels providing strategic guidance and oversight.

1.6 Achievements to Date

The project has to date reached 494,910 beneficiaries, rehabilitated 35km of roads and side drainage, employed a total of 4747 persons in skilled and unskilled labour activities, including 753 women, 933 IDPs, and 28 PWDs. Additionally, 73 individuals participated in internships and on-the-job training 86 municipal staff have been trained across six participating cities and stakeholder consultations and awareness-raising efforts have reached 13,064 individuals. Also, 98% (318) of the 322 reported grievances have been resolved. Drought response activities, including cash transfer, water and sanitation facilities, and temporary housing, land, and property (HLP) have been successfully completed in September 2024, providing life-saving assistance to more than 1 million people. 9 SURP-II has already helped define intergovernmental functional roles and responsibilities related to urban services. With relatively strong implementation arrangements and broad geographic coverage, SURP-II has

⁹ 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.

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.

Progress made under each component is presented in the subsequent section.

- a. Under Component 1:** critical and highly visible infrastructure have been constructed in the form of asphalt roads, drainage, and bridges among others. Error! Reference source not found. provides a summary of achievements in the construction of climate resilient urban infrastructure in four cities.

Table 2: Achievements under Component One

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

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

Project Activity	Description & Status
Package 1B – Irida Aamin Road (3 km)	<ul style="list-style-type: none"> • RAP review ongoing
Package 2 – Road #1 Inner Ring Road (3.25 km)	<ul style="list-style-type: none"> • RAP review ongoing
Package 3 – Sheikh Hassan Barsane Road (3 km)	<ul style="list-style-type: none"> • RAP review ongoing
Garowe Municipality	
Package 2: Gambool Bridge & Roads	<ul style="list-style-type: none"> • Includes construction of Gambool Bridge (145m) and Gambool Road (1.22 km), plus • additional works on East Africa University Road (580m) and • Main City Road Expansion (500m), completed 100% by 5 February 2025.
Citywide Stormwater Drainage	<ul style="list-style-type: none"> • Feasibility study and DED for Lot 2, Part 1 completed. • Advertised in February 2025 and contract awarded on 25 April 2025. • There are remaining lots, including two new segments, to be finalized by August 2025.
PIU Office Building	<ul style="list-style-type: none"> • Structural assessment and designs completed. • Procurement initiated with invitation to bids on 26 April 2025.
Urban Road Designs (~20 km)	<ul style="list-style-type: none"> • Final designs for approximately 20 km of roads in Garowe have been completed.
Hargeisa	<ul style="list-style-type: none"> • No activities yet.

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

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

Under Component 4, the following milestones have been reached:

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

1.7 Lessons from Managing E&S Risks in SURP II and AF1, AF2 and AF3

Several lessons have been learnt from the management of environmental and social risks for SURP II and its AFs, especially in the implementation of the present Environmental and Social Management Framework (ESMF). The PIU teams have been well grounded in WB's ESF requirements and have taken the lead in the preparation of over twenty-five Environmental and Social Management Plans (ESMPs), ten Resettlement Action Plans (RAPs), six Security Management Plans (SMPs), and seven Labour Management Procedures (LMPs), all of which have been prepared and disclosed by the six municipalities in accordance with the requirements of the ESF.

The lessons range from those related to the preparation of the ESMF to those learnt during its implementation, and are enumerated hereunder:

- The implementation of SURP has provided a poignant **identification of potential risks and impacts** in SURP II and the AFs. The mitigation measures adopted address risks and impacts that are common in SURP II and the AFs, such as presence of septic tanks on or near the right of way (RoW), methods of consultations with different segments of the community, area-specific modalities of addressing security needs, among other pertinent lessons learnt.
- **Waste management** has been a challenge both during and after construction. Beginning sensitization and awareness raising early on in the project is important for SURP II and the AFs. The uncollected solid waste and wastewater from the community has caused damages and pollution to some subproject sites. While the broader issue of municipal waste goes beyond site-specific mitigation, SURP II TA aims to enhance Mogadishu's capacity in the collection and disposal of solid waste.
- The beneficiary satisfaction survey indicates that the SURP has generated **positive impact on community health and safety**: (i) speed bumps and road signs have improved general road safety and reduced cases of accidents that used to be common before the constructions; (ii) the walkways have also made the roads safer for use by all groups of pedestrians including children, the elderly and persons with disabilities; (iii) there is general improvement of security along the newly constructed roads, aided by the prevalence of night-time streetlighting facilities; (iv) there are no more pools of water that accumulates within the target areas as it used to be before drainages were rehabilitated; (v) this has also improved environmental health and reduced cases of vector borne diseases such as bilharzia and malaria. Nevertheless, given the climate change impact, lack of proper drainage system and inadequate municipal waste management, the parent project and the AFs continue to closely monitor potential urban flooding and community safety risks that could be exacerbated by road construction.

- While the **climatic conditions** are generally the same in Somalia, sometimes the *Gu*¹⁰ rainy season can extend into the *Xaggaa*¹¹ dry season in coastal areas as seen during SURP implementation in Mogadishu. This is considered under SURP II to help contractors improve their planning of the works to avoid delays and flood related risks.
- Although there have been no incidents of **Gender Based Violence (GBV)** in SURP, neither was sufficient awareness raising conducted. Under SURP II and the AFs operations, the project team is working to clarify understanding of GBV as considered by the World Bank. This can be achieved through related training offered for the Grievance Redress Committees (GRCs) and project contractors, and workers, and sensitization workshops for all parties involved in SURP II and the AFs.
- **Increased collaborations between the E&S Specialists and Project Engineers** at the PIU, engineering and supervising consultant (ESC), and the contractor is needed to ensure better implementation of the E&S risk management instruments, e.g., the RAP, before providing the contractor with notice to proceed and handing over the site. The parent project experienced some cases where PIU E&S Specialists were not fully informed of the evolving engineering design of priority investments in a timely manner, which caused inconsistencies between the project design and the coverage of E&S instruments.
- **Integration of E&S requirements with the procurement process** has been key in forestalling any procurement- related E&S issues in the management of the works contract- related challenges. There were a few cases where E&S requirements were not fully integrated with procurement processes, which hindered effective contractor management on E&S mitigations. Thus, a review of the Contractor's Environmental and Social Management Plan (C-ESMP) prior to contractor mobilization by the PIU E&S Specialists is conducted to ensure the contractor has all the required tools.
- **Reporting** by the contractor and the ESC has not been comprehensive, given inadequate awareness of the World Bank's E&S requirements. For SURP II and the AFs, training and awareness raising on the World Bank's ESF requirements and periodic technical meetings have improved the E&S reporting.
- Because of security issues in the country, the project has sought the services of a **Third-Party Monitor (TPM)**. Improving the level of engagement between the TPM team and the team on the ground (PIU, contractor, and ESC) has been key to forestalling any misunderstanding on risk identification and mitigation measures that are in place. During SURP II project implementation it has become clear that pre-visit briefings could have been more in-depth if there were more personnel in the TPM with a clearer understanding of local culture as part of the TPM team. In addition, clear addressing of TPM findings would significantly minimize misunderstanding and help improve the quality of the reporting in SURP II and the AFs.
- **Enhancing the inclusion of vulnerable and disadvantaged groups.** For the AF3, additional public consultations were conducted by the project teams at the

¹⁰ This refers to the main rainy season in Somalia, starting in mid-March and running to June.

¹¹ This is a cool, dry and rather cloudy season starting in July and lasting until mid-September; some weather stations along the southern coast, including Mogadishu (and in the northwestern regions) receive significant amounts of rainfall during this season, hence this caution.

municipalities to prioritize activities under the AF3. The subproject selection criteria focused on investments that benefit all community segments. Further, PIUs prioritized investments through a participatory decision-making process, and communities' feedback was sought and considered. The PIUs will generate employment and skills-upgrading opportunities for locals by ring-fencing a percentage of these benefits for vulnerable or disadvantaged individuals and explore measures to mitigate gender prejudices in construction. Also, the limited inclusion of women in employment has been reported under the project, with only two cities-Mogadishu and Garowe, endeavoring to employ women and other disadvantaged groups. In this regard, and to strengthen the provisions of the LMP regarding the inclusion of vulnerable or disadvantaged groups, the following clause is captured in the LMP, and municipalities shall be required to include it in bidding documents and contracts. *'The contractor shall develop a Local Recruitment Plan (LRP) in line with the provisions of the Labour Management Procedures on fair treatment, equal opportunity, and non-discrimination. The contractor shall provide employment opportunities- unskilled, semi-skilled, and skilled, as appropriate to vulnerable or disadvantaged groups such as women, Persons with Disabilities (PWDs) for jobs they can do, ethnic minorities, and IDPs, among others. The contractor shall create awareness among affected parties about job opportunities and provide PIU with disaggregated employment data as part of the monitoring process.'*

- **Municipal disclosure and coordination during project screening:** A non-project related forced eviction incident by Baidoa Municipality has highlighted the urgent need for better coordination and transparency in project planning and screening. It emphasizes how crucial it is for municipalities to disclose any current or planned development projects—like infrastructure investments, changes in land use, or urban renewal—within or adjacent to the proposed project area. To avoid unintended consequences and protect communities, the screening team needs to actively seek this information during the subproject selection and environmental and social screening phases. The goal is to pinpoint any potential overlaps or conflicts that could impact land availability, community settlements, or the overall environmental and social landscape. As part of this process:
 - Municipalities are required to formally notify the PCU in writing of any planned or ongoing land acquisition or structure demolition activities near or within the project footprint.
 - Planned activities near or within the project footprint must not proceed without pre-clearance from the PCU, which will assess potential environmental and social risks and determine the need for further action or mitigation.

This enhanced coordination mechanism aims to strengthen due diligence, uphold safeguard standards, and avoid unintended displacement or community disruption during project implementation.

- **Duration between RAP preparation and implementation:** Due to funding limitations, there have been instances where the gap between the disclosure of the RAP

and the commencement of civil works exceeds three years. Throughout this waiting period, municipalities should utilize various channels to keep the public informed, with updates at least every six months regarding the expected investments. Additionally, an assessment should be conducted to evaluate any changes that may have occurred during this waiting period. It is also recommended to minimize the gap between RAP disclosure and the start of civil works.

- **Grievance Management.** To date, no grievances have been directly reported at Tier 3 (National Level) of the Grievance Redress Mechanism. However, a recent non-project-related forced eviction incident in Baidoa has highlighted critical gaps in awareness and accessibility of this tier among affected communities. Specifically, it underscored a limited understanding of Tier 3 functions and insufficient uptake channels for lodging complaints at the national level. In response, the project has initiated targeted awareness-raising activities to improve public understanding of the Tier 3 mechanism. Efforts include the prominent display of grievance uptake channels in public spaces and government offices, as well as the launch of a dedicated telephone hotline to facilitate direct access. These measures are aimed at strengthening the overall functionality, visibility, and responsiveness of the GRM across all levels.
- **Site Security During Non-Working Days.** An investigation into a recent fatality at a project site in Garowe revealed that one of the contributing factors was the insufficient presence of security personnel during non-working days, particularly on Fridays, which are official rest days in Somalia. This lapse in implementation highlights a critical gap in adherence to established SMPs. To address this, municipalities should ensure that all security measures outlined in the SMPs are maintained consistently, including during weekends and public holidays. The required number of trained security personnel, access control measures, and emergency response protocols should remain in force without exception. Project sites must always be secured, regardless of working hours, to protect both equipment and the public and to prevent unauthorized access or potential harm. Failure to maintain appropriate security coverage during off-days not only increases risk but also undermines compliance with community health and safety obligations under ESS4.
- **Working During Non-Permitted Hours.** An incident reported in Kismayo revealed that a contractor was operating a crusher outside of the permitted working hours, in violation of agreed site operating protocols. This unauthorized activity posed risks to community safety, generated excessive noise, and undermined local trust in the project. To prevent recurrence, security personnel assigned to project sites must be clearly instructed to monitor and report any contractor activity occurring outside of the approved working hours. Any such incidents should be immediately reported to the PIU and UNOPS for appropriate follow-up and enforcement. Maintaining compliance with permitted working hours is essential for minimizing disturbances to surrounding communities, ensuring occupational safety, and upholding safeguards obligations under the ESSs. Contractors found in breach may be subject to corrective actions, including suspension of work or contractual penalties.

- **Incident Reporting Requirements.** An incident at a crusher site in Kismayo revealed a delay of over one month between the occurrence of a worker injury and its formal reporting. This serious lapse in communication resulted in the suspension of civil works, highlighting the operational and financial consequences of failing to comply with incident reporting protocols. All contractors and sub-contractors must be clearly informed that failure to report incidents—regardless of severity—within the required timeframe constitutes a breach of contract. Such non-compliance may lead to corrective actions, financial penalties, or suspension/termination of works, in addition to undermining the project's commitment to safety and accountability. Additionally, a recently reported sexual exploitation and abuse or sexual harassment (SEA/SEAH), grievance by a sub-contractor staff, currently under investigation, revealed that greater clarity is needed on the reporting and handling procedures when the incident involves sub-contractors working under a UN entity, specifically UNOPS in its role as the engineering supervision consultant. To address these gaps clear coordination mechanisms should be established between the PIU, UNOPS, and relevant safeguard focal points for cases involving SEA/SEAH, labour violations, or other sensitive matters tied to UN-affiliated sub-contractors.
- **Occupational Health and Safety (OHS) Risks.** Two recent fatalities in Mogadishu during the assessment of stormwater drainage lines revealed critical lapses in the use of appropriate personal protective equipment (PPE) and safe work procedures. These incidents underscore the need for stronger enforcement of OHS protocols, especially for high-risk activities such as working in confined spaces. To address these shortcomings, the Engineering Supervision Consultant (ESC) must:
 - Ensure that all workers are equipped with task-specific PPE, including respiratory protection, fall arrest gear, helmets, gloves, and visibility clothing, depending on the nature of the activity.
 - Verify that OHS requirements are fully integrated into worksite induction, daily toolbox talks, and job hazard analyses.
 - Provide mandatory training and certification for all personnel involved in high-risk tasks, particularly confined space entry, trenching, or work near hazardous utilities.
 - Monitor compliance regularly and take immediate corrective actions when violations or unsafe conditions are identified. Failure to comply with OHS standards not only exposes workers to life-threatening risks but also constitutes a breach of contractual obligations and safeguard requirements under World Bank Environmental and Social Standard 2 (ESS2) on Labour and Working Conditions.

2. LEGAL AND INSTITUTIONAL FRAMEWORKS IN SOMALILAND

2.1 Introduction

This section describes the existing policy, legislative and institutional framework that will be important for consideration in the design, implementation, monitoring and evaluation of the AF4. The legal frameworks in Somaliland are shaped by a combination of customary law (Xeer), Islamic law (Sharia), and statutory law. Somaliland operates as a self-declared independent state, and although it is not recognized as such by the international community, it has established its own legal system and institutions. The institutional framework in Somaliland is characterized by a complex system that has evolved since the region declared independence from Somalia in 1991. Although not internationally recognized as a separate state, Somaliland has established a functioning government with its own constitution, political structures, and institutions.

This ESMF will guide the implementation of AF4. Specific E&S instruments shall be prepared for each subproject, decided on a case-by-case basis, with omnibus ESMPs (incorporating LMP and SEP) being the preferred ESF instruments for small-scale projects with minor, localized E&S risks.

2.2 Environmental and Social Frameworks for Somaliland

General Framework

The Republic of Somaliland through the Ministry of Parliamentary relations and Constitutional affairs approved and proclaimed to the whole world since 31st May, 2001. Therefore, the current fundamental policy framework is based on this Constitution. Policies and legislation developed under the Government of Somaliland in Hargeisa were gradually replaced and renewed by the same. However, most are now in draft, final consultation and approval phase and have draft status as indicated below. Currently enforcement of environmental regulations and ESIA procedures follow the procedures of respective development partner and the Country's Environment policy. Most sectoral policies within the field of natural resources management are very sector-oriented given that they are regarded only from the perspective of how they interact with each sector, instead of being considered as a common asset to be managed by the sectors jointly to achieve a wise, fair and sustainable development of the country's wealth for all. As a result, each sector devolves a part or all the cost of its development into other sectors.

a. Institutional Framework

Somaliland has four administrative levels, namely: (1) national (2) Regional, (3) District, and (4) Community or village, all of which will play pivotal roles during the construction and operation of the road project. At the national and state level ministries are established, and below that the administrations have departments or units for the various sectors. Ministries directly involved in sectors such as Agriculture Development, Water, Livestock and fisheries, forestry, wildlife, are directly responsible for natural resources management. Ministries

responsible for finance, rural development, physical planning, Petroleum and mining and health and road infrastructure play a facilitating role in assuring effective management of natural resources and the environment. Those responsible for raising awareness on the importance of protecting the environment and sustainable development include the ministries in charge of education; communication/ Information; gender, culture and youth; and local Government.

b. The Constitution of Somaliland

Somaliland has been functioning as an independent state since 1991 despite the lack of international recognition. In pursuance of the resolutions of the Conference of the Somaliland Communities held in Burao on 27th April to 5th May 1991, which reaffirmed (their) independence with effect from 18th May 1991; and noting that the Conference of the Elders of the Somaliland Communities held in Borama from 24th January to 25th May 1993 adopted a National Charter which: the Republic of Somaliland has laid down that a national constitution which will replace the national charter be prepared and consulted upon within a year; and set out clearly the constitutional principles and the governmental structures, confident in their communities' inalienable right to decide their destiny. Therefore, cognizing the major reasons of paramount importance Country level through judicial procedures including national beliefs and cultural aspirations and through participation of all stakeholders; the people of Somaliland approved and proclaimed to the whole world on this 31st May, 2001, that this constitution has been adopted as the nation's Constitution.

The Constitution contains provisions related to land as a national property and establishes the state responsibility for the land and natural resources. Article 12 says, "The land is a public property commonly owned by the nation, and the state is responsible for it¹²", and shall take all possible steps to explore and exploit the natural resources which are available in the nation's land or sea. The protection and the best means of the exploitation of these natural resources shall be determined by law.

Article 31 of the Constitution recognizes that every person has the right to own private property, if it is acquired lawfully, and that such property may not be expropriated except for reasons of public interests in the exchange of proper compensation. Private property ownership includes land in which Art. 2(1) of Law No. 8/1999, and 19(a) of Law No. 17 established private ownership of land with the title deed.

Part Two General Principles, Article 12: Public Assets, Natural Resources and Indigenous Production. According to this article of the Constitution;

- The land is a public property commonly owned by the nation, and the state is responsible for it.
- The care and safeguarding of property, endowments and public assets is the responsibility of the state and all citizens; and shall be determined by law.
- The Government shall have the power to own and possess movable and immovable property; and to purchase, sell, rent, lease, exchange on equivalent value, or otherwise expend that property in any way which is in accordance with the law.

- The central state (government) is responsible for the natural resources of the country and shall take all possible steps to explore and exploit all these resources which are available in the nation's land or sea. The protection and the best means of the exploitation of these natural resources shall be determined by law.
- Where it is necessary to transfer the ownership or the benefits of a public asset, the transfer shall be effected in accordance with the law.
- The state shall encourage indigenous economic production such as agriculture, livestock, fisheries, minerals, production of frankincense and myrrh and gum etc., and manufacture based on indigenous products.
- The payment of Zakat is a cornerstone of Islam, and its administration shall be determined by law.

Part Two General Principles, Article 18 describes also about: Environment and Disaster Relief encompassing the following;

- The state shall give a special priority to the protection and safeguarding of the environment, which is essential for the well-being of the society, and to the care of the natural resources. Therefore, the care of and (the combating of) the damage to the environment shall be determined by law.
- The state shall undertake relief in disasters such as famine, storms, epidemics, earthquakes, and war.

Article 19: The Care of the Vulnerable of the Society

The state shall be responsible for the health, care, development and education of the mother, the child, the disabled who have no one to care for them, and the mentally handicapped persons who are not able and have no one to care for them.

Article 20: Work, Trade, and the Welfare of Employees

- All able citizens have a right and a duty to work. The state shall, therefore, be responsible for the creation of work and the facilitating of the skills training of employees.
- The conditions of work of the young and women, night working and working establishments shall be regulated by the Labour Law.
- All employees have a right to payment appropriate to the work they undertake and are free to enter into agreements with their employers on an individual or collective basis. Forced labour is prohibited.
- The state shall endeavour to create understanding and clear rights between employees and employers and shall accordingly introduce a law (in this respect).
- State employees and members of the armed forces shall be entitled remuneration, pension and to payments for sickness, injury, or disability in accordance with the law.
- The state shall promote the support systems, insurance and safety of employees and shall strengthen the relevant responsible bodies.

Article 31: The Right to Own Private Property

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

In Article 34 it states that:

Every citizen shall have the duty to care for, protect and save the environment.

c. National Environment Policy, 2015

The Ministry of Environment and Rural Development has developed a National Environmental Policy. The overall vision of the National Policy on Environment is to provide a framework management guide for the management of Somaliland's environment and natural resources so as to ensure that they are managed on a sustainable basis and retain their integrity to support the needs of the current and future generation without compromising either of the two. The National Policy incorporates a clear set of Objectives, Guiding Principles and Strategies that will bind all organizations and individuals to exercise due care to avoid depletion of natural assets and environmental degradation. The Constitution of the Republic of Somaliland enshrines matters that relate to the environment and natural resource management thus providing the keystone to the National Policy on Environment. Article 18 of the Constitution affirms that: "The state shall give a special priority to the protection and safeguarding of the environment, which is essential for the wellbeing of the society, and to the care of the natural resources. Therefore, the care of and (the combating of) the damage to the environment shall be determined by law".

In Article 34 it states that:

"Every citizen shall have the duty to care for, protect and save the environment".

The National Policy on Environment recognizes the requirements set out in the Constitution and acknowledges the responsibility of civil society and all citizens to protect and conserve the environment and all its resources and to manage the environment in all its aspects to fulfill these obligations.

The National Policy on Environment underlines the commitment of government, in partnership with the people, effectively to manage the environment for the benefit of present and future generations. The aim of this Policy is to ensure sound environmental management within a framework of sustainable development in Somaliland. The Policy is supported by many other policies and strategies developed for other sectors and it now provides a holistic approach, following Millennium Development Goals, to establish a national strategy based upon cross-sectoral consensus for care for the environment.

The Policy emphasizes that it is the duty of any institution, government or non-governmental organization, any community group or people's organization or any individual that uses or

otherwise carries out activities that affect the environment in any way, to exercise proper control to maintain the Productivity and integrity of the environment. The Policy is set against a background that includes macroeconomic issues, the Millennium Development Goals, and National Poverty Reduction Strategy and it considers economic incentives for improved environmental management.

Under Macro-economic Policy Issues The Reconstruction and development Program (RDP), which is the current development framework, was prepared through participatory planning process by all stakeholders. The RDP is the product of the combination of the Interim Strategic Note, United Nations Transitional Plan (UNTP) for 2008-2010, and the EC and Norway Country Strategic Paper; and integrated with the local development input from the recommendations drawn by the national and international development experts. The RDP development vision is deepening peace and poverty reduction; and has three development pillars, which are further grouped into ten development sectors, namely- governance, education, health, water and sanitation, livelihood, infrastructure, private sector, ICT, emergency and recovery and religion.

Somaliland's Environment Management Law No 79/2018

The Republic of Somaliland with its Environmental matters sector representative, Ministry of Environment has approved an Environmental Management Lo No 79/2018. This law expresses the will of the government through its Ministry the rules and responsibilities which must be considered by any actor of the sector as the directive framework in every development endeavor requiring Environmental Impact Assessment (EIA) studies. The law besides describing the general principles and administration matters it dwells well on the environmental planning issues both at National and District levels which is so important for infrastructure developmental projects.

The law explains the role and mandatory and regulatory issues of EIA of developmental projects while conducting EIA in the Democratic Republic of Somali land. Under Part 5 Environmental Impact Assessment of this law (Article 11-17) encompasses fiscal incentives, application for an EIA, publication of EIA, submission of EIA report after issuance of EIA license, Transfer of EIA license, protection in respect of a license and revocation and cancelation of license. Further details are provided in:

- Part 6 (Article 6-7) refers to Environmental Audit and Environmental Monitoring
- Part 7 (Article 8-54) refers to Environmental Quality Standards
- Part 8 (Article 55-63) states about Environment restoration and Easement orders.
- Part 9 (Article 64-66) states Analysis and recording.
- Part 10 (Article 67) refers to Convention, agreements and treaties on environment.
- Part 11 (Article 68) states competent part for environmental matters.
- Part 12 (Article 69-81) states about Environmental offences.

d. National Water Policy

The Republic of Somaliland with its water sector representative, Ministry of Mining, Energy and Water Resources approved a National Water Policy on the 22nd of June 2004. The National Water Policy expresses the will of the government for the development of the water

sector and must be considered by any actor of the sector as the directive framework for their actions. Any action undertaken in the water sector in Somaliland must comply with this policy and the rest of the regulatory framework developed for the sector.

This policy is the first element constituting the global regulatory framework for the water sector. These elements are the National Water Policy, the National Water Strategy, the Water Act and the Water Regulations.

Main goal of the water sector development: to improve availability and access to water in a sustainable and equitable way for all different types of uses, in a manner that is environmentally safe. The Policy also promotes cross-cutting principles that may serve one or several of the previous objectives. Among these principles also provide general guidance for any actor when preparing its intervention includes equitable water use, environmental sustainability, local management, private sector participation, gender approach and decentralization. According to this policy, surface water is a complementary resource that can help reduce the pressure on groundwater resources. The lower level of quality of this resource makes it more suitable for nondomestic applications, such as: Livestock watering, Agriculture irrigation, House cleaning, Industrial production (except for drinking purposes), Sanitation. Ponds, dams, ballehs and berkads are the main technologies in use for harnessing surface water. The key policy principles for development and utilization of surface water resources are as follows:

- The promotion of the construction and rehabilitation of ballehs and berkads by other actors than government agencies.
- The co-ordination at central level of the planning of such infrastructure to avoid concentration and risk of conflicts.
- The utilization of such water for domestic purposes must be guided by safe public health practices (treatment, transportation, preservation) to limit the risk of waterborne diseases.

e. Somaliland Tenure Policy

The Constitution contains provisions related to land as a national property and establishes the state responsibility for the land and natural resources. Article 12 says, “The land is a public property commonly owned by the nation, and the state is responsible for it¹²”, and shall take all possible steps to explore and exploit the natural resources which are available in the nation’s land or sea. The protection and the best means of the exploitation of these natural resources shall be determined by law. Article 31 of the Constitution recognizes that every person has the right to own private property, if it is acquired lawfully, and that such property may not be expropriated except for reasons of public interests in the exchange of proper compensation. Private property ownership includes land in which Art. 2(1) of Law No. 8/1999, and 19(a) of Law No.17 established private ownership of land with the title deed. 12 Official versions to refer is the Somali and it has the same meaning, as in this English version (Somalilandlaw.com)

Under the constitution, people have equal rights and obligations before the law and shall not be discriminated against on the grounds of the clan, birth, gender, property, status or opinion (Art. 8). Article 36 of the Constitution recognizes that women and men enjoy equally the

rights, freedoms and duties laid down in the Constitution, “save for matters which are specifically ordained in Islamic Sharia”. It further provides that the government shall encourage and legislate for “the right for women to be free of practices which are contrary to Sharia and which are injurious to their personality and dignity”; women have the right to “own, manage, oversee, trade in or pass on property in accordance with the law”. In light of this, women can legally own and control land but there are many cases in which customary rules prevail over statutory law, especially in rural areas where traditional social systems discriminate against women and impede them from owning and controlling land. This constitutional principle for women’s rights need to be interpreted into practice and mainstreamed into programs within the public sector delivery of services.

There are several legislative instruments that have been adopted to govern specific sectors related to land. Prominent among them are the Agricultural land ownership Law No. 8/1999 and Urban land management law No. 17/2001. There are also other laws on mining, livestock, water and environment that are relevant to land governance.

Apart from the Somaliland land tenure Policy an analysis of Legal Issues Related to Land in Somaliland (Final Draft Report April 2016) has been reviewed as it has a number of amendments of the previous land tenure documents. According to this document Article 8 of Law No. 8/1999 provides that if agricultural land is nationalized for public use, the state has to pay compensation to the previous owner within three months. The law does not specify the remedial procedures to be followed in order to ensure fair compensation is received by the previous owners. Urban land may similarly be expropriated for public purpose subject to compensation to owners. Under Art. 1 and 6 of law No. 17, the President of Somaliland has the authority to issue decree transferring land for the public interest or town re-planning after consulting with the Cabinet and the National Urban Land Planning Committee. Public interest means the use of land for the construction of new roads, extension of existing roads, bridges, electrical and communication lines, offices and government buildings and any other reason deemed necessary. The presidential decree will be circulated through official channels. The National Land Planning Committee is responsible for the evaluation of the costs and payment of compensation for the properties affected by the re-planning, and an owner shall also receive a plot that is equal, in terms of size and location, to the plot that is expropriated.

As mentioned above, under Art. 12 of the Constitution, the state is responsible for land administration, but this part will examine how the administration is delegated to different authorities including Ministries and local authorities.

According to Art. 3 of Law No. 08/99, the Minister of Agriculture is responsible for the administration of agricultural land on behalf of the government, and at the same time, the Ministry issues title deeds and makes registration of farms.

On the other hand, Law No. 17/2001 established the National Urban Land Planning committee²¹ which is responsible for urban planning, approval of master plans and extension of towns. The Committee is comprised of six Ministries including Ministers of agriculture and rural development and the Minister of Public.

The lack of a comprehensive land policy, the desperate and to some extent inconsistent legal frameworks and weak institutional governance in land administration has shifted public trust from the public institutions to the clan system where communities feel their land is more secure through clan protection. For instance, elders have assumed crucial decision-making powers in land disputes. Sometimes, the police and judicial institutions redirect critical land cases to elders for the latter to pass final judgments that are often enforced. However, even the decisions of elders may be rejected by a losing party, and this can lead to unresolved clan disputes, especially among pastoral and agro pastoral communities where clashes over scarce resources lead to conflicts that are difficult to prevent or resolve.

f. National Forestry and Wildlife Conservation Low-Act No. 69/2015

The annotated translation of this law was developed with the goal of facilitating understanding and practice of the law by non-native Somali speakers who may not be knowledgeable about the context or history of conservation in Somaliland, and in particular by persons and organization with an interest in wildlife conservation. The law was developed in 2015, gazetted in 2016. According to this low, the Somali duurjoog is translated as wildlife, and duur means in various instances wildlife as well as forest. This implies that, as per standard international definitions, the concept of wildlife pertains to both flora and fauna. However, in this law, wildlife is used most frequently in reference to animals (especially vertebrates), while other language is used in reference to plant life. Indeed, separate articles lay out the law and consequences of illegal action for the land (plant) resources versus animals.

This law also encompasses: Wildlife Trafficking: Include of animals: Articles 18 (clauses 8-13), 19, 21, 27, and 31, of plants: Article 31 and of charcoal (deforestation): Article 11, Clause 7.

Environmental democracy: • Public participation: Article 3 (clauses 4-5), Article 10 (clauses 1 and 3), Article 11 (clauses 2 and 4), Article 14 (clause 3), Article 16 (clauses 2e and 2g) •

Citizen justice: Article 18 (clauses 6-7), Article 25 (clauses 1 and -7), Article 26 (clause 1), Article 30 (clause 2) Forest and grazing reserves: Article 3 (clauses 7-8), Article 8 (clause 5), Articles 12-14

Commerce: Article 7 (clause 2); Article 9, Article 11 (clause 7), Article 15, Article 18 (clause 3), Article 21

Alternative Energy: Article 3 (clauses 10-11), Article 11, Article 16 (clause H) The law contains prime categories and penalties and the Ministry of Environment and Rural Development shall be responsible for implementing this act. The Ministry shall:

- Carry out monitoring and census activities of plant and wildlife resources.
- Carry out, once every three years, a census on the natural resources of the country, subsequently preparing a written report. The report and the findings of the census should be published by the Ministry.

- Improve the capacity of the staff and others assigned to preserve forests and wildlife, so that they can accurately fulfil their duties as described in this act.
- Organize a national awareness campaign to engage different segments of society.
- Develop forestation programs (projects) with the participation of individuals, communities, and organizations interested in planting trees and grasses.
- Report on endangered plants and wildlife and develop conservation and preservation programs.
- Create and manage protected areas.
- Improve the establishment and management of private and public forests.
- Provide licenses for managing tree resources in accordance with this act.
- Be responsible for carrying out research on environmentally-sound alternative energy sources.
- Seek alternative energy sources to replace charcoal.
- Establish forest and wildlife guards for the enforcement of this act.
- Collaborate with other ministries, NGOs, and others interested in improving the education and equipment of environment and wildlife guards.

This law explains the legal establishment and the duties and responsibilities of the Environment Conservation Committees at National, Regional, District and Village levels.

Very important chapters and articles stated under Act No.69/2015 specifically indicated as below.

Chapter 3 of this law states the protection of forests, trees, grazing lands and fences

Chapter 4 states Private and Public Forests which encompasses the Creation and Management of Private and Public Forests as well as Alternative Energy Source Development

Chapter 5 states about reserve, creation of new reserve, type of reserve and their demarcations and management and protection of reserves

Chapter 6 states about wild life conservation, exporting and importing wild life animals

Chapter 7 under Exemptions and Permits for Wildlife as for example Predators, Birds and Turtles Article 21 describes that:

- It is forbidden to hunt, trade, and export wildlife as for example predators, birds, and turtles inhabiting Somaliland.
- It is forbidden to issue permits legalizing hunting, trading, or exporting wildlife as for example predators, birds, and turtles living (inhabiting) inside Somaliland.

g. The Coastal and Marine Resource Policy of Somaliland

In September 1995, Somaliland Law on Fisheries was promulgated to deal with jurisdiction of the Somaliland maritime zone, resources management, licensing and penalties. To strengthen the Law on Fisheries, the Coastal and Marine Resource Policy of Somaliland was approved at the end of 2000. The Policy provides a clear vision on resource development and the conservation of biodiversity. The following is the specific principles and objectives stipulated in the Policy:

- Optimizing the long-term social and economic benefits from the coastal and marine environment for Somaliland and its people;

- Protecting the rich biodiversity of Somaliland's marine and coastal environments for present and future generations;
- Adopting responsible fisheries practices so as to ensure sustainable use of living marine resources;
- Coordinating coastal and marine resource use and planning, at a national level;
- Promoting fair, equitable and transparent governance over marine and coastal resources;
- Meeting international and regional obligations to marine and coastal matters;
- Allocating central budgets for fisheries development, and
- Developing partnerships with stakeholders, communities and local authorities to achieve optimal management of resources.

h. Polluter Pay Principle (PPP), 1974

The Polluter Pays Principle (PPP) is an environmental policy principle which requires that the costs of pollution be borne by those who cause it. In its original emergence the Polluter Pays Principle aims at determining how the costs of pollution prevention and control must be allocated: the polluter must pay. Its immediate goal is that of internalizing the environmental externalities of economic activities, so that the prices of goods and services fully reflect the costs of production. Bugge (1996) has identified four versions of the PPP: economically, it promotes efficiency; legally, it promotes justice; it promotes harmonization of international environmental policies; it defines how to allocate costs within a State. The normative scope of the PPP has evolved over time to include also accidental pollution prevention, control and clean-up costs, in what is referred to as extended Polluter Pays Principle. Today the Principle is a generally recognized principle of International Environmental Law, and it is a fundamental principle of environmental policy of both the Organization for Economic Co-operation and Development (OECD) and the European Community.

2.3 International Covenants/Agreements Ratified By Somaliland Relevant to the Project

While Somaliland has unilaterally declared independence from Somalia and established its own governing institutions, it is not internationally recognized as a sovereign state. As a result, it is not a formal signatory to most international treaties and conventions.

Nevertheless, Somaliland maintains informal diplomatic relations, engages with some international organizations, and has entered into agreements and memoranda of understanding with individual countries and entities, often on issues such as development, trade, and security. Despite its status, Somaliland collaborates with **foreign governments, international NGOs, and donor agencies** on environmental programs. These include efforts in:

- Climate change adaptation
- Natural resource management
- Reforestation and land restoration
- Coastal and marine protection

Related international guidelines, agreements, conventions and treaties which are generally respected in the republic of Somaliland. They include:

- The Convention on Trade in Endangered Species (CITES);
- The Ramsar Convention on Wetlands of International importance especially as Waterfowl Habitat;
- The Convention on Biodiversity (1992);
- The United Nations Framework Convention on Climate Change (1992);
- The convention concerning the protection of workers against occupational hazards in the working environment, and
- The Basel Convention on the Control of Trans-boundary Movement of Hazardous Wastes (1989).

2.4 World Bank Environmental and Social Standards

The SURP II project is subject to the requirements of the World Bank's ESF¹² launched on October 1, 2018. The ESF enables the World Bank and Borrowers/Recipientsto better manage environmental and social risks of projects and to improve development outcomes. The ESF offers broad and systematic coverage of E&S risks. It makes important advances in areas such as transparency, non-discrimination, public participation, and accountability including expanded roles for grievance mechanisms. The ESF includes ten ESSs that seek to avoid, minimize, else mitigate the adverse effects of development projects, the following eight ESSs are applicable to SURP-II and its AFs:

- ESS1: Assessment and Management of Environmental and Social Risks and Impacts;
- ESS2: Labour and Working Conditions;
- ESS3: Resource Efficiency and Pollution Prevention and Management;
- ESS4: Community Health and Safety;
- ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement;
- ESS6: Biodiversity and Sustainable Management of Living Natural Resources'
- ESS8: Cultural Heritage, and
- ESS10: Stakeholder Engagement and Information Disclosure.

More details on the ESSs and how they apply to the SURP II, and its AFs are enumerated in **Table 3** below.

Table 3: WB's Environmental and Social Standards and Their Relevance

Standard	Relevant ?	Explanation on Application
<i>ESS1 Assessment and Management of Environmental and Social Risks and Impacts</i>	Yes	ESS1 sets out Somalia's and Somaliland's responsibilities for assessing, managing, and monitoring environmental and social risks and impacts associated with each stage of SURP II and the AFs (including AF4) in order to achieve environmental and social outcomes consistent with the Environmental and Social Standards (ESSs).

¹² Please see <https://www.worldbank.org/en/projects-operations/environmental-and-social-framework> for more details.

Standard	Relevant ?	Explanation on Application
		<p>As a result, the original ESMF was prepared, in conjunction with other environmental and social instruments and the same will be done for this updated ESMF. Examples of previously prepared instruments include:</p> <ul style="list-style-type: none"> • Resettlement Planning Framework¹³ • Labour Management Procedures¹⁴ • Stakeholder Engagement Framework¹⁵
<i>ESS2 Labour and Working Conditions</i>	Yes	<p>While the exact labour use (including the number of project workers, their characteristics and timing of workforce mobilization) is to be determined during the implementation of each subproject, the project workers engaged or employed will include:</p> <ul style="list-style-type: none"> • direct workers, people employed or engaged directly by the borrower such as consultants hired in PIUs, PCU, as well as staff from the project proponent, implementing agencies and other relevant government entities (civil servants). The civil servants will remain subject to the terms and conditions of their existing public sector employment. • contracted workers, people employed or engaged thorough third parties to perform work related to the core functions of the project, such as skilled permanent staff of the primary contractor (construction company), skilled workers engaged by sub-contractors (such as heavy machine operators), and unskilled community members engaged by the contractor (such as host community members and IDPs including female workers; and • primary supply workers, people employed or engaged by the borrower's suppliers, such as workers to produce essential construction materials such as aggregates and concrete blocks on an ongoing basis for the project. <p>Potential labour risks and mitigations: Potential risks related to labour and working conditions include:</p>

¹³ <https://documents1.worldbank.org/curated/ar/867721531143850738/RPF-June-22-2018-FINAL.docx>

¹⁴ <https://documents1.worldbank.org/curated/en/708321598478775293/Labour-Management-Procedures-Somalia-Urban-Resilience-Project-II-P170922.docx>

¹⁵ <https://documents1.worldbank.org/curated/en/171571570146765040/pdf/Stakeholder-Engagement-Plan-SEP-Somalia-Urban-Resilience-Project-Phase-II-P170922.pdf>

Standard	Relevant ?	Explanation on Application
		<ul style="list-style-type: none"> • OHS risks: Workers may be exposed to a variety of typical OHS risks, including slips, trips and falls at construction site; lifting of heavy materials; being struck by objects; elevated levels of particulate matter in the air; risks associated with use of hand powered tools, exposure to chemicals (e.g., paints, cleaning liquids, hot bituminous mixtures, etc.); risks due to vibrations; risks due to welding and cutting; risk due to excessive and repetitive noise; and risks due to communicable and vector-borne diseases. Also, workers may be exposed to traffic related accidents from residential and commercial vehicles travelling on roads where workers are deployed and workers transporting materials and wastes to and from the construction site. In addition to this, collapsing of borrow pits with workers inside is also a risk with the type of prevailing materials in the area. Finally, with the hot and dry climate of Somalia, workers may be exposed to heat-related injuries such as heat stroke and heat exhaustion; • Child labour. • Labour influx. • Labour disputes over terms and conditions of employment. • Discrimination and exclusion of vulnerable/disadvantaged groups. • Security risks (workers exposure to attacks). <p>Labour Management Procedures (LMP) have been prepared for specific municipalities and also updated for the AF4 project, with relevant mitigation measures that will be incorporated into procurement documents.</p>
<i>ESS3 Resource Efficiency and Pollution Prevention and Management</i>	Yes	<p>Because of the nature and relatively moderate scale of the works, the risks and impacts related to resource efficiency and pollution will be minor, temporary, and confined to the area immediately surrounding the construction.</p> <p>These risks related to ESS3 include the normal impacts of civil works (i.e. dust, noise, erosion, surface water sedimentation, pollution from construction wastes and water use), as well as waste from worker campsites.</p> <p>To address these short-term impacts, this ESMF includes standard operating procedures and good construction management practices, include those proposed in WB Environmental and Health Safety Guidelines (EHSGs).</p>
<i>ESS4 Community</i>	Yes	<p>Community health and safety impacts will be minor, temporary, and confined to the area immediately surrounding the construction.</p>

Standard	Relevant ?	Explanation on Application
<i>Health and Safety</i>		<p>Anticipated risks and impacts include community health and safety risks associated with construction/rehabilitation work, such as traffic safety, community exposure to diseases, hazardous materials, and emergency preparedness.</p> <p>To address these short-term impacts, the ESMF includes standard operating procedures and good construction management practices, include those proposed in WB EHSGs.</p> <p>The project has already prepared city-specific SMPs. These plans help SURP II and its AFs in the seven cities including Hargeisa to provide structured frameworks for security risks, ensuring the safety of project personnel and assets, and facilitating the uninterrupted implementation of activities in volatile environments. To address potential risks associated with the security personnel to be hired by contractors, the project will apply relevant mitigation measures in compliance with ESS4, and the WB Good Practice Note on the use of security personnel.</p> <p>Assessment of the risk of Gender Based Violence (GBV) such as Sexual Exploitation and Abuse (SEA) for subprojects is conducted during subproject preparation.</p> <p>Given the assessment of GBV risks under the project, and given the context of pervasive insecurity, the project adopts a robust approach to address potential GBV risks.</p> <p>Relevant mitigation measures to address these risks (e.g., integrating Codes of Conduct with GBV SEA-related protections, community consultations and awareness raising, and mapping activities to identify potential service providers, and establishment of GM with procedures and channels to enable safe, confidential, and ethical reporting of GBV incidents) are articulated in this ESMF.</p> <p>The project will also implement the GBV Action Plan (Annex 5) and elaboration of provisions for Third Party Monitoring (TPM).</p> <p>The project will also implement capacity building and training of relevant stakeholders including contractors and project workers, in addition to capacity building for government partners.</p> <p>GBV risks will be monitored throughout project implementation through regular re-assessment with the risk screening tool, particularly as new project locations are determined, and through regular monitoring engagement.</p>
<i>ESS5 Land Acquisition, Restrictions on Land Use and</i>	Yes	<p>The resettlement impacts of each subproject are likely to be moderate due to the limited size and nature of the individual physical works.</p> <p>The physical displacement will be minimized and duly compensated.</p>

Standard	Relevant ?	Explanation on Application
<i>Involuntary Resettlement</i>		The economic displacement will largely relate to mobile vendors or temporary impact during the construction, which will be also minimized. More details are presented in the RPF.
<i>ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources</i>	Yes	<p>While a few locations in a few municipalities may contain some land with inherent environmental sensitivity relevant to ESS6, the subproject screening process in the ESMF will exclude such sensitive areas.</p> <p>The ESMF includes specific measures to avoid or minimize negative impact on critical or protected areas if the subproject screening process does not otherwise exclude these areas.</p>
<i>ESS7 - Indigenous Peoples/ Sub-Saharan African Historically Underserved Traditional Local Communities</i>	No	<p>ESS 7 is currently not applicable under the parent project, three AFs and the proposed AF. No groups meeting the criteria for ESS 7 have been identified in Hargeisa.</p> <p>Stakeholder consultations have highlighted the presence of Internally Displaced Persons (IDPs) and a minority group/clan known as Gabooye in Hargeisa. Acknowledging the vulnerabilities of both IDPs and the Gabooye, the project will, in alignment with ESS 10 and ESS 1, implement measures to engage and consult meaningfully with all segments of the community. This includes ensuring that IDPs and any culturally or ethnically distinct groups are adequately informed about the project and can access its benefits equitably and in a culturally appropriate way. The SEF and this ESMF Annex 11 outline the measures necessary for the meaningful inclusion of all disadvantaged groups.</p>
<i>ESS8 Cultural Heritage</i>	Yes	<p>There is the potential for chance find of cultural or archaeological significance during construction and the existence of some historic buildings around the secondary road investments that could potentially be impacted from the construction.</p> <p>The ESMF has been updated to comply with ESS8, and the subproject specific ESMPs will address these issues through the inclusion of chance find procedures.</p> <p>More details are available in Annex 6 of this ESMF.</p>
<i>ESS9 Financial Intermediaries</i>	No	Not relevant to this project.
<i>ESS10 Stakeholder Engagement and Information Disclosure</i>	Yes	Key stakeholders include PAPs), people who will be physically or economically displaced by the project, as well as those benefitting from project-related employment or business opportunities, vulnerable or disadvantaged groups), host communities, federal, state and municipal

Standard	Relevant ?	Explanation on Application
		<p>authorities, religious and local leaders, Civil Society Organizations (CSOs), and other development partners.</p> <p>As discussed in ESS1, the potential disadvantaged and vulnerable groups for SURP II AF4 stakeholder engagement process include:</p> <ul style="list-style-type: none"> • IDPs, refugees and returnees. • Poor households (such as female headed, widows, elderly, orphans, persons living with severe illness). • Persons with disabilities. • Illiterate community members. • Religious and ethnic minorities, and other minority groups. • Female community members and female workers. <p>SURP II AF4 will take differentiated measures to include such groups into stakeholder engagement activities, such as through focus group/individual meetings, mediation by community support groups, accessible consultation venues, simply written materials or graphics or provision of free municipal transport.</p> <p>More details on the consultation, information disclosure and the GM are presented in the updated SEF.</p>

2.5 Environmental Health and Safety Guidelines

The World Bank Group (WBG) has guidelines for Environment, Health and Safety (EHS) that serve as useful references for general as well as sector-specific activities. The EHS guidelines are mainly on environmental, occupational health and safety, community health and safety as well as on construction and decommissioning. It contains cross cutting guidelines on environmental (waste management, ambient air quality, noise, and water pollution), occupational health and safety issues among others, applicable to all the industry sectors. Considering the nature of the urban infrastructure to be supported under SURP II and its AF4, the General EHS guidelines are applicable.

2.6 Gap Analysis

The activities in SURP II AF4 project, including the respective subprojects, need to comply with both existing Somalia and Somaliland laws and regulations and World Bank ESSs. This sub-section compares the national public sector environmental and social management rules, regulations and standards to World Bank's ESSs. The main objective of this assessment is to help implement this ESMF more effectively in Hargeisa through an understanding of existing gaps.

Table 4 below summarizes a comparison focusing on the World Bank ESF relevant to the project and gaps identified in existing Somaliland laws and regulations. Note: the E&S framework instruments indicated in the table refer to their most updated version.

Table 4: Gap Analysis on WB's Environmental and Social Standards and Legislation in Somaliland

Scope	World Bank E&S Standards (ESSs)	Government of Somalia policies, Regulations	Gaps Identified	Gap-filling Measures
<i>ESS1 Assessment and Management of Environmental and Social Risks and Impacts</i>				
ESIA instruments	Range of instruments to satisfy ESS1 requirements include ESIA's, regional or sectoral ESAs, ESMPs, etc.	Somaliland's Environment Management Law No 79/2018 explains the role and mandatory and regulatory issues of Environmental Impact Assessment (EIA) of developmental projects while conducting EIA in the Democratic Republic of Somali land.	The E&S regulatory framework is available in Hargeisa (Somaliland) and is easily enforceable. However, there is limited institutional capacity and resources to manage E&S risks in Somaliland.	Somaliland's ESIA regulations and the updated ESMF to guide the Borrower. The World Bank has embarked on the implementation of a Programmatic Analytical Services and Advisory (P-ASA), the Environment, Social, and Security Risk Management (ESSRM) initiative to provide capacity building support to Somalia. This P-ASA aims at directly supporting the Somalia and Somaliland government in strengthening country systems for managing E&S risks and includes a big component on gap-filling and knowledge management.

Scope	World Bank E&S Standards (ESSs)	Government of Somalia policies, Regulations	Gaps Identified	Gap-filling Measures
Environmental impact screening	Screening procedures developed for projects involving subprojects, as is the case in SURP II.	Somaliland's Environment Management Law No 79/2018 explains the role and mandatory and regulatory issues of EIA of developmental projects while conducting EIA in the Democratic Republic of Somaliland.	The E&S regulatory framework is available in Hargeisa (Somaliland) and is easily enforceable. However, there is limited institutional capacity and resources to manage E&S risks in Somaliland.	Updated ESMF and Somaliland's Environment Management Law No 79/2018 to guide the Hargeisa Municipality.
Public consultations	ESS1 requires the Borrower to initiate consultations with PAPs and other interested parties including civil society.	Somaliland's Environment Management Law No 79/2018 explains the role and mandatory and regulatory issues of EIA of developmental projects while conducting EIA in the Democratic Republic of Somali land.	The E&S regulatory framework is available in Hargeisa (Somaliland) and is easily enforceable. However, there is limited institutional capacity and resources to manage E&S risks in Somaliland.	SEF and Somaliland's Environment Management Law No 79/2018 to guide the Borrower. The World Bank has embarked on the implementation of a Programmatic Analytical Services and Advisory (P-ASA), the Environment, Social, and Security Risk Management (ESSRM) initiative to provide capacity building support to Somalia. This P-ASA aims at directly supporting the Somalia and Somaliland government in strengthening country systems for managing E&S risks and includes a big component on gap-filling and knowledge management.

Scope	World Bank E&S Standards (ESSs)	Government of Somalia policies, Regulations	Gaps Identified	Gap-filling Measures
Monitoring environmental data	ESS1 requires regular monitoring of environmental data to evaluate the success of mitigation and to foster corrective measures at the earliest possible juncture.	Somaliland's Environment Management Law No 79/2018 explains the role and mandatory and regulatory issues of Environmental Impact Assessment (EIA) of developmental projects while conducting EIA in the Democratic Republic of Somali land.	The E&S regulatory framework is available in Hargeisa (Somaliland) and is easily enforceable.	ESMF and Somaliland's Environment Management Law No 79/2018 to guide the borrower.
Institutional arrangements	Requirement by the World Bank for specific description of institutional arrangement and implementation schedule for monitoring and mitigation measures.	Ministry of Environment The Municipality of Hargeisa.	The Ministry of Environment of Somaliland will be responsible for coordinating institutional responses under this ESMF.	Hargeisa PIU to work with the respective ministries and agencies responsible for management of environmental matters as the focal points for administration of this ESMF.
<i>ESS2 Labour and Working Conditions</i>				

Scope	World Bank E&S Standards (ESSs)	Government of Somalia policies, Regulations	Gaps Identified	Gap-filling Measures
Management of different types of project workers	The World Bank puts emphasis on the identification and characterization of different types of workers (project workers, direct workers, contracted workers, community workers, primary supply workers) to manage different types of labour risks.	Article 20: of the Somaliland constitution on Work, Trade, and the Welfare of Employees and provides for: i) employee rights including right to payment appropriate to the work they undertake, ii) freedom to enter into agreements with their employers on an individual or collective basis; iii) prohibition of forced labour etc.,	The Somaliland Constitution are broadly consistent with the ESS2, while there is a significant gap in the enforcement aspect of the legislation. More details are presented in the LMP.	The updated ESMF and the Labour Management Procedures (LMP) to guide the Borrower.
<i>ESS3 Resource Efficiency and Pollution Prevention and Management</i>				
Pollution prevention and management	ESS3 requires the Borrower to undertake a health and safety risk assessment of any existing pollution which may affect communities, workers and the environment.	Somaliland's Environment Management Law No 79/2018 has provisions on pollution prevention and management	The E&S regulatory framework is available in Hargeisa (Somaliland) and is easily enforceable.	The updated ESMF to guide the Borrower on pollution prevention and management.

Scope	World Bank E&S Standards (ESSs)	Government of Somalia policies, Regulations	Gaps Identified	Gap-filling Measures
		Further the Polluter Pays Principle (PPP) of Somaliland requires that the costs of pollution must be borne by the polluter. PPP seeks to internalize the environmental externalities of economic activities, so that the prices of goods and services fully reflect the costs of production.		
Manage ment of hazardou s wastes	ESS3 requires the Borrower to undertake specific measures to manage both hazardous and non-hazardous wastes. Specific emphasis is given in ESS3 with respect to transportation and disposal, obtaining a chain of custody	Somaliland's Environment Management Law No 79/2018 explains the role and mandatory and regulatory issues of Environmental Impact Assessment (EIA) of developmental projects while conducting EIA in the Democratic Republic of Somali land.	The E&S regulatory framework is available in Hargeisa (Somaliland) and is easily enforceable.	The updated ESMF to guide the Borrower on the management of both hazardous and non-hazardous wastes.

Scope	World Bank E&S Standards (ESSs)	Government of Somalia policies, Regulations	Gaps Identified	Gap-filling Measures
	documentation to the final destination. Approved disposal sites are required for ESS3.			
<i>ESS4 Community Health and Safety</i>				
Traffic and road safety	ESS4 requires the Borrower to identify, evaluate and monitor the potential traffic and road safety risks to workers, affected communities and road users throughout the project life cycle and, where appropriate, will develop measures and plans to address them.	Somaliland's Environment Management Law No 79/2018 explains the role and mandatory and regulatory issues of Environmental Impact Assessment (EIA) of developmental projects while conducting EIA in the Democratic Republic of Somali land.	The E&S regulatory framework is available in Hargeisa (Somaliland) and is easily enforceable.	The updated ESMF to guide the borrower on road traffic safety.
Security personnel	ESS4 postulates that when the Borrower retains security personnel to safeguard workers and property, it will assess risks posed by these security arrangements to those	The civil servants in Somaliland are governed by the Constitution. The Somaliland National Police Force is the primary official	While the quality of security services provided by the police in Hargeisa needs to be confirmed the project will coordinate with the	Project to be guided by relevant provisions of ESS4 on the deployment of security personnel to project sites. In addition, the Hargeisa PIU will follow the requirements for deployment of security personnel in project sites in line with the Good Practice Note on "Assessing and

Scope	World Bank E&S Standards (ESSs)	Government of Somalia policies, Regulations	Gaps Identified	Gap-filling Measures
	<p>within and outside the project site.</p> <p>The Borrower will not sanction any use of force by direct or contracted workers in providing security except when used for preventive and defensive purposes in proportion to the nature and extent of the threat.</p>	<p>institution at the national level that are responsible for providing internal security and public order. The international community is supporting the capacity building of the national police forces.</p>	<p>law enforcement authorities in each municipality to manage associate risks.</p>	<p>Managing the Risks and Impacts of the Use of Security Personnel. Security assessments and plans will be made at municipality level.¹⁶</p>
<i>ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement</i>				
Physical and economic displacement	<p>ESS5 covers the involuntary taking of land, resulting in loss of shelter or loss of assets: a hierarchy has been provided that seeks to minimize losses to affected persons. It</p>	<p>The Somaliland constitution and the land tenure policy contains provisions related to land as a national property and establishes the state responsibility for the</p>	<p>The lack of a comprehensive land policy, the desperate and to some extent inconsistent legal frameworks and weak institutional governance in land</p>	<p>The revised ESMF and RPF to guide the Borrower on handling project related land issues</p>

¹⁶ For more details on this Good Practice Note, please refer to the World Bank's publication, available at <http://documents.worldbank.org/curated/en/692931540325377520/Environment-and-Social-Framework-ESF-Good-Practice-Note-on-Security-Personnel-English.pdf>

Scope	World Bank E&S Standards (ESSs)	Government of Somalia policies, Regulations	Gaps Identified	Gap-filling Measures
	forbids forced evictions.	land and natural resources. Further, there are several legislative instruments that have been adopted to govern specific sectors related to land. Prominent among them are the Agricultural land ownership Law No. 8/1999 and Urban land management law No. 17/2001.	administration has shifted public trust from the public institutions to the clan system where communities feel their land is more secure through clan protection. For instance, the police and judicial institutions redirect critical land cases to elder's for the latter to pass final judgments that are often enforced. However, even the decisions of elders may be rejected by a losing party, and this can lead to unresolved clan disputes, especially among pastoral and agro pastoral communities where clashes over scarce resources lead to conflicts that are	

Scope	World Bank E&S Standards (ESSs)	Government of Somalia policies, Regulations	Gaps Identified	Gap-filling Measures
			difficult to prevent or resolve.	
<i>ESS8 Cultural Heritage</i>				
Management of risks on tangible and intangible cultural heritage, including legal protection to cultural heritage sites	ESS8 requires the Borrower to manage risks on tangible and intangible cultural heritage, including identification of the presence of all listed legally protected cultural heritage areas affected by the project.	Somaliland's Environment Management Law No 79/2018 explains the role and mandatory and regulatory issues of Environmental Impact Assessment (EIA) of developmental projects while conducting EIA in the Democratic Republic of Somali land. Through this framework, matters to do with management of risks on tangible and intangible cultural heritage, including legal protection to cultural heritage sites.	Somaliland's first Bill on Somaliland's Cultural Heritage Law and Management was completed in 2022.	The revised ESMF to guide the Borrower.
<i>,ESS10 Stakeholder Engagement and Information Disclosure</i>				

Scope	World Bank E&S Standards (ESSs)	Government of Somalia policies, Regulations	Gaps Identified	Gap-filling Measures
Engaging key stakeholders and publicly disclosing project information	ESS10 requires Borrowers to engage with stakeholders throughout the project life cycle. This ESS requires Borrowers to provide stakeholders with timely, relevant, understandable, and accessible information.	<p>The E&S regulatory framework is available in Hargeisa (Somaliland) and is easily enforceable.</p> <p>The Constitution of Somaliland emphasizes the importance of participatory governance, where citizens have the right to engage in public affairs.</p> <p>The legal framework also recognizes the rights of communities to oppose projects that threaten their land or livelihoods.</p> <p>Regulations support the role of civil society organizations in advocating for the rights of various stakeholders, ensuring that</p>		Updated SEF to guide the Borrower.

Scope	World Bank E&S Standards (ESSs)	Government of Somalia policies, Regulations	Gaps Identified	Gap-filling Measures
		<p>marginalized voices are heard.</p> <p>Engagement mechanisms include community forums, surveys, and public hearings, making it essential for stakeholders to actively participate to influence outcomes.</p>		

3. BASELINE CONDITIONS

3.1. Physical environment

The AF4 activities are set to take place in Hargeisa, the capital city of Somaliland, situated at coordinates 9° 33' 44.6" N latitude and 44° 4' 37.2" E longitude. Hargeisa lies within a valley surrounded by the Galgodon (Ogo) highlands, positioned at an altitude of approximately 1,334 meters (4,377 feet) above sea level.

Somaliland, officially known as the Republic of Somaliland, is a self-declared autonomous state since 1991 located in the Horn of Africa. Although it operates as a de facto sovereign entity, it remains internationally unrecognized and is considered by the global community as part of the Federal Republic of Somalia. Somaliland occupies a strategic position along the southern coast of the Gulf of Aden, sharing borders with Djibouti to the northwest, Ethiopia to the south and west, and Somalia to the east. Somaliland topography consists of three main land forms:

- Piedmonts and the coastal plain (Guban) southward from the Red Sea with elevations ranging from sea level to 600m
- Hills and dissected mountains (Ogo) of rugged topography rising to more than 1,500m
- The plateau (Haud) with large areas of gently undulating Plains

Climate: Somaliland lies north of the Equator and has a dry climate, with most regions designated as arid, with a few, smaller, areas as semi-arid. Hargeisa has a semi-arid climate (BSh under Köppen Climate Classification). Overall, its climate follows a fairly typical monsoon pattern, though with four distinct seasons. The city experiences two dry seasons Jilaal (long dry season): December to March and Xagaa (short dry spell): July to August and two rainy seasons: Gu (main rainy season): April to June and Deyr (short rainy season): Late September to early November. Annual rainfall is approximately 400 to 500 mm (16 to 20 inches), but highly variable and prone to drought cycles. Hargeisa has mild to hot temperatures year-round with daytime highs of 25°C to 35°C (77°F to 95°F) and nighttime lows of 15°C (59°F), especially in December-January. The highland elevation keeps Hargeisa cooler than the lowland regions of Somaliland. The Climate challenges facing the city include:

- Frequent droughts impacting water availability and agriculture
- Flash floods may occur in urban areas during intense rains, due to poor drainage infrastructure. High dust levels and dry winds during dry seasons.

Soils: The area around Hargeisa is characterized by shallow, sandy, and rocky soils, which are common across the northern parts of the country. Nevertheless, the higher rainfall received in the highland zones near Hargeisa enhances the organic content of these calcareous, sandy soils. This enrichment improves soil fertility, making them viable for small-scale rain-fed farming, unlike the more barren soils found in other arid regions.

Water: Hargeisa primarily depends on groundwater drawn from boreholes and wells for its water supply. Key extraction sites include Geed Deeble, Horahadley, and Las Dureh,

located approximately 20 to 25 kilometers from the city. Surface water resources are minimal, as Hargeisa lacks permanent rivers and lakes. Seasonal streams, known locally as *toggas*, provide surface runoff during the rainy seasons, but these are unreliable and insufficient for continuous water supply. The city is grappling with severe water shortages, largely driven by the rapid expansion of its urban population, which has outstripped the capacity of existing water infrastructure. The current supply systems are inadequate to meet the growing demand, forcing a large segment of the population, particularly those in areas without piped water connections, to rely on water trucks and vendors. These alternative sources are often costly, posing an economic burden on low-income households. In response, initiatives like the Hargeisa Urban Water Supply Project (HUWSUP), supported by the European Union (EU) and UN-Habitat, are underway to upgrade and extend the city's water supply infrastructure, aiming to alleviate the chronic shortages and improve access to safe water.

3.2. Biological environment

Flora: The landscape around Hargeisa is characterized by thorn-bush and shrub vegetation. Common plants include various acacia species, *balanites aegyptiaca*, and *Commiphora* species, with some areas also featuring *Boswellia* and other woody plants. Tamarisk thickets can be found along riverbeds. The aggressive *Prosopis juliflora* ("Garan-waa") has spread rapidly around Hargeisa, threatening water resources and local ecosystems due to its deep-rooted, water-hungry nature. It displaces native vegetation and lowers the water table. Around homesteads and roadways, species like neem, moringa, and eucalyptus are commonly planted for shade, soil conservation, and multipurpose use.

Fauna: Like many urban centers, Hargeisa is home to a diverse range of wildlife, including mammals, birds, reptiles, and insects that have adapted to living alongside human populations. Dogs, cats, and livestock are common sights within the city, often roaming freely or kept for companionship and livelihood purposes. On the outskirts, particularly in rocky terrains, *Hamadryas* baboons are frequently observed. The city also supports a variety of bird species, such as rock pigeons, different species of doves, sparrows, hornbills, weavers, and crows. In terms of reptiles, Hargeisa hosts multiple lizard species, including the Somali agama (*Agama bottegi*), Hardegger's Orangetail Lizard (*Philochortus hardeggeri*), Heyden's Gecko (*Hemidactylus robustus*), and the Somali Sharp-snouted Worm Lizard (*Ancylocranium somalicum*). Additionally, various snake species inhabit the city and its surroundings, notably the Somali puff adder (*Bitis arietans somalica*), which is highly venomous. The Leopard tortoise (*Stigmochelys pardalis*) is another notable reptile species found in and around Hargeisa.

3.3. Social Environment:

Population: here are no definitive sources of population figures for Hargeysa. The Somaliland population was estimated at 3.6 million in 2014. and 4.2 million in 2020 using the growth rate of 2.93 percent, with bulk of the population living in urban centres¹⁷. Somaliland has a young population with 37.8 percent of the population being less than 15 years old, and roughly 72 percent of the population being under 30 years. (PESS, 2014). World Population Prospects (2024 Revision) - United Nations population estimates and projections, Hargeisa's 2025 population is now estimated at 1,227,620.¹⁸

Political structure and Governance: Somaliland's government considers itself the successor to the former British Somaliland Protectorate, which, following a brief period of independence as the State of Somaliland in June 1960, voluntarily united with the Trust Territory of Somaliland (former Italian Somaliland) to form the Somali Republic. However, following the collapse of the Somali state in 1991, Somaliland reasserted its independence and has since maintained its own political and administrative institutions, despite the lack of international recognition. Somaliland has established a functioning government with a focus on democratization and traditional leadership. Governance includes an executive, bicameral legislature, and independent judiciary. Traditional elders play a role in conflict management and governance.

Economy: As of 2018, Somaliland's Gross Domestic Product (GDP) was estimated at USD 2.5 billion, with a GDP per capita of USD 56619. The economy of Somaliland is largely anchored in livestock exports, mainly to gulf countries such as Saudi Arabia and Oman, which serve as the primary driver of economic activity. Although the region has made commendable strides in economic growth—mostly attributed to the livestock sector—it continues to grapple with significant hurdles stemming from its lack of international recognition. Since proclaiming independence, Somaliland's government revenues have grown progressively; however, the region still qualifies as a low-income economy. Livestock remains the economic backbone, with roughly 60% of the population depending on livestock production and related activities for their livelihoods. Additionally, about 20% of the populace is engaged in subsistence farming. Diaspora remittances continue to be a critical economic lifeline for many families, playing a major role in supporting livelihoods throughout Somaliland.

The absence of formal recognition on the international stage hinders Somaliland's ability to engage in bilateral trade deals, attract infrastructure development partners, and secure foreign direct investment (FDI). It also reduces access to substantial international aid from global donors. In response to these limitations, Somaliland established the Somaliland Development Fund (SDF) in 2012, which serves as a consolidated platform to coordinate development assistance. Access to Infrastructure. Lack of access as a result of poor

¹⁷ https://somalia.unfpa.org/sites/default/files/pub-pdf/slhds2020_report_2020.pdf

¹⁸ <https://www.britannica.com/place/Hargeysa>

¹⁹ https://somalia.unfpa.org/sites/default/files/pub-pdf/slhds2020_report_2020.pdf

infrastructure, particularly roads, is inhibiting socio-economic development in the region. Private sector business remains relatively limited so there are few employment opportunities.

Gender: According to UNDP Somaliland, the region ranks among the countries with the highest levels of gender inequality globally, with a Gender Inequality Index (GII) score of 0.776, placing it fourth worldwide²⁰. Women and girls in Somaliland face extremely high rates of maternal mortality, sexual violence, female genital mutilation (FGM), and child marriage, while incidents of gender-based violence (GBV), including sexual exploitation and abuse (SEA), are widespread²¹. Women's participation in politics and decision-making processes remains very limited, reinforcing entrenched gender roles and systemic inequality. Despite women comprising 57% of the workforce in agriculture and pastoralism—sectors that make up almost 70% of Somaliland's economy—their presence in public service roles remains low. Only about 19% of government employees are women. The gender gap is also evident in education, with girls accounting for just 36% of students in upper primary school. Gender disparities become more pronounced in higher grades due to financial hardships and the prevalence of early marriages. Women in Somaliland play a vital role in trade and commerce, ranging from small-scale businesses to larger enterprises. They are prominently involved in butchering and selling goats and sheep, and dominate the trade of fruits and vegetables in local markets. Additionally, many women are engaged in selling imported goods like rice, sugar, wheat, and sorghum.

vulnerable groups: In Somaliland, including its capital Hargeisa, several groups are considered vulnerable due to socio-economic, cultural, environmental, and political factors. These groups often face marginalization, limited access to services, and heightened exposure to risks. Key vulnerable groups include:

- IDPs who reside in informal settlements around Hargeisa due to conflict, drought, and evictions. They face poor living conditions, lack of secure tenure, limited access to water, sanitation, education, and health services. Evictions and tenure insecurity remain critical issues, particularly in urban expansion zones.
- Female-headed households, particularly among IDPs, are disproportionately affected by poverty and lack of safety nets.
- Children and Youth (including street children). High rates of child labour, out-of-school children, and street children are prevalent, especially in urban poor areas. Youth unemployment is extremely high, contributing to social frustration and vulnerability to radicalization or illegal migration.

²⁰ <https://www.undp.org/somalia/our-focus/genderequality#:~:text=Gender%20equality%20and%20women's%20empowerment%20are%20among%20the%20major%20challenges,government%20and%20decision%20making%20bodies.>

²¹ https://somalia.unfpa.org/sites/default/files/pub-pdf/slhds2020_report_2020.pdf

- **Elderly Persons.** Elderly individuals, especially in poor or displaced communities, lack social protection systems and are dependent on family or community support, which is often inadequate.
- **Persons with Disabilities (PWDs).** Persons with physical, sensory, or intellectual disabilities face social stigma, accessibility barriers, and limited tailored services in education, healthcare, and employment.
- **Minority Clans and Marginalized Ethnic Groups.** Certain minority clans and ethnic groups (e.g., the Gabooye and Tumul) face historical marginalization, social exclusion, and limited participation in public life.

4. CONSULTATIONS AND PUBLIC DISCLOSURE UNDER AF 4

4.1 Consultations under SURP II AF 4

Stakeholder consultations for AF4 commenced in Nairobi on 24 April 2024 where the PCU had their first discussion with the Mayor of Hargeisa and the Directors for Public Works, Administration and Finance. Some of the key issues discussed during the consultation include introducing the expected AF4, the World Bank's ESF, the ESCP and the need to update the E&S instruments including the SEF, ESMF, RPF, and LMP. Further, a stakeholder mapping and analysis exercise was carried out on 3rd – 11th March 2025, as well as in April and June 2025 to identify stakeholders to be consulted in Hargeisa, in accordance with the Project's SEF. 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. **Table 5** provides a summary of the consultation while Annex 10 provides more details on the same.

The preliminary stakeholder consultations were primarily structured around key thematic areas, including stakeholder engagement, grievance management, gender, GBV-SEA/SH, involuntary resettlement, and vulnerable groups. The PIU informed the stakeholders about the project scope, target beneficiaries, timelines, benefits and opportunities, responsibilities, potential project risks and impacts and mitigation measures, institutional/implementation arrangements, and potential investments. A total of 141 stakeholders (106 males and 35 females) were engaged. Consultations noted there was consensus among stakeholders that the project would be critical in enhancing the city's infrastructure and also alleviate the insecurity plight facing IDPs living in the outskirts through improved lighting. Some of the barriers identified include those likely to impede women's access to jobs in the construction sector. Further, community members raised their expectations of having jobs, compensation for affected assets, the willingness of women to engage in minor work such as making food for the workers, and trained women engineers to work in construction. In addition, IDPs are at high risk of GBV because they live in the city peripheries with poor security lighting. Finally, all districts provided a list of all their infrastructure needs, including drainage systems and the inner ring road, topping the list of priorities.

Table 5: Outcome of the Stakeholder Consultation

Project	Municipality	Dates	Remarks
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.

Project	Municipality	Dates	Remarks
		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. • 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 to 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 , 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 3-12, 2025.
			Responses from community members and community-based structures

Project	Municipality	Dates	Remarks
			<ul style="list-style-type: none"> • Job Opportunities • Community members indicated they expected to be provided with jobs during construction. <p style="text-align: center;">1. Gender</p> <ul style="list-style-type: none"> • 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. <p style="text-align: center;">2. Security Concerns</p> <ul style="list-style-type: none"> • 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. <p style="text-align: center;">3. Gender Based Violence</p> <ul style="list-style-type: none"> • 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. <p style="text-align: center;">4. Involuntary Resettlement and compensation</p> <ul style="list-style-type: none"> • 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. • 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.

Project	Municipality	Dates	Remarks
			<ul style="list-style-type: none"> • 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 a need for land acquisition, which is unlikely looking at the proposed investment, the government has the capacity to allocate such land. • The inclusion of informal vendors and micro-enterprises in the project's compensation framework. • Vendors eligible under the entitlement matrix will receive advance written notification prior to construction, allowing them to relocate with dignity and minimal loss.

Project	Municipality	Dates	Remarks
			<ul style="list-style-type: none"> • 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. • 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. <p>Stakeholder Engagement and Grievance Management</p> <ul style="list-style-type: none"> • 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.

Project	Municipality	Dates	Remarks
			<p>Members of community-based organizations indicated:</p> <ul style="list-style-type: none"> • Connectivity between the different areas of the city should be a big priority. • IDPs living in the city outskirts should not be forgotten. <p>Community members from the districts indicated:</p> <ul style="list-style-type: none"> • 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.

4.2 Grievance Mechanism

General principles. The project already has a grievance mechanism (GM) that addresses concerns of stakeholders promptly and effectively and in a transparent manner. It will remain culturally appropriate and readily accessible to all PAPs, at no cost and without retribution. The mechanism will not prevent access to judicial or administrative remedies. The PAPs will be informed about the grievance process in the course of community engagement activities. The summary of registered grievances and actions taken will also be made public.

Handling of grievances will be discreet, objective, sensitive and responsive to the needs and concerns of the PAPs. The mechanism will also allow for anonymous complaints to be raised and addressed. Individuals who submit their comments or grievances may request that their name be kept confidential. While the updated SEF provides more details on the GM for the project, this section provides a concise summary of the mechanism as follows.

The procedures for redressing grievances are explained in the schematic excerpt below (*see Figure 2*).

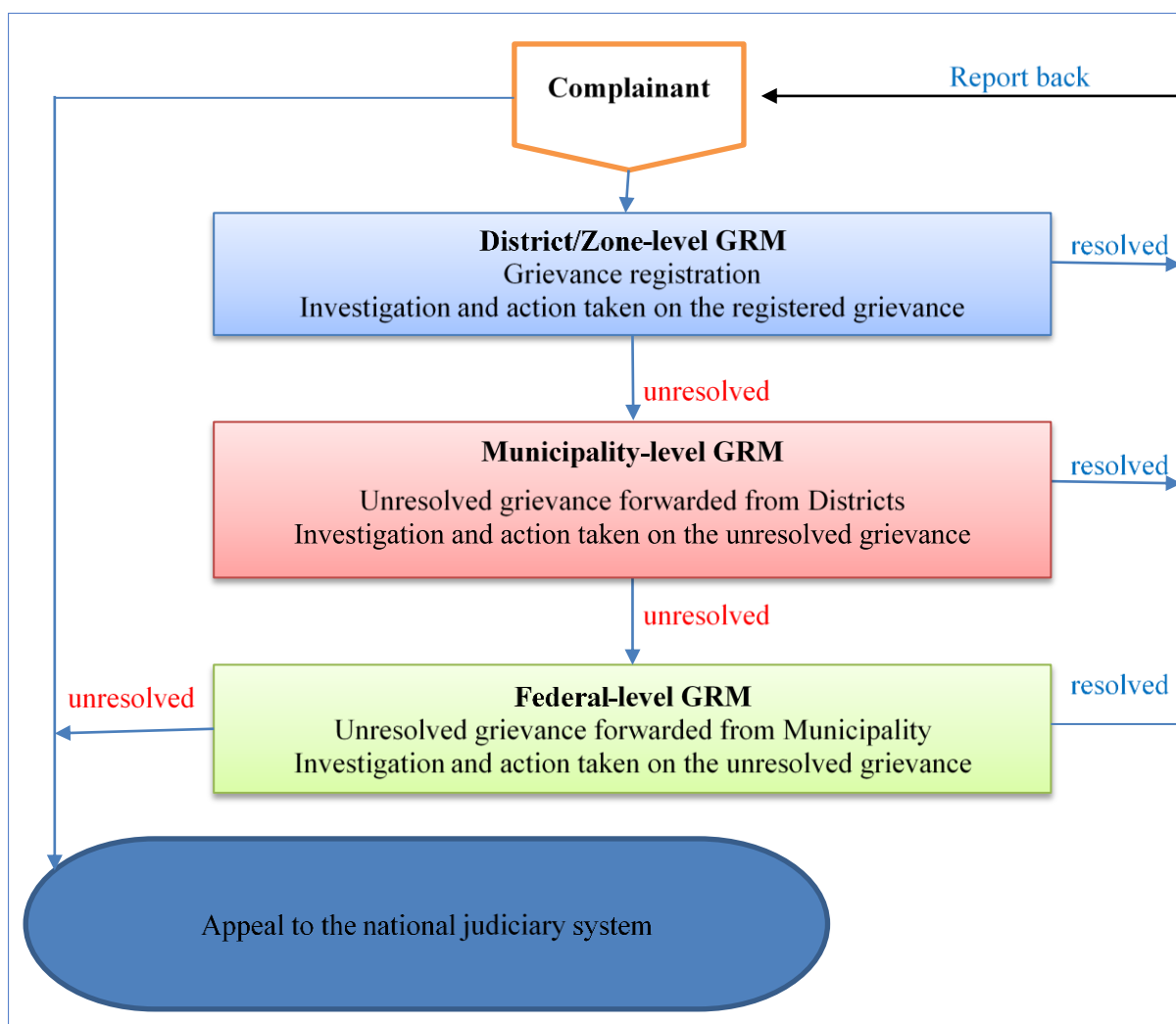


Figure 1: Grievance Mechanism for SURP II And The AFs

Any comments and grievances regarding SURP II and AFs can be submitted through different channels including in person, by phone, text message or email. Contact details for registering grievances in SURP II and AFs implementing municipalities are presented in **Table 6** below.

Table 6: Contact Details for Registering Grievances

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.

World Bank Corporate Grievance Redress Service (GRS) Communities and individuals who believe that they are adversely affected by a World Bank supported project may submit complaints to the Bank's GRS (grievances@worldbank.org) as well as the World Bank Independent Inspection Panel (accountability@worldbank.org). For more information visit <http://www.worldbank.org/GRS>.

4.3 GM channels to Address Gender-Based Violence

To avoid the risk of stigmatization, exacerbation of the mental/psychological harm and potential reprisal, the GM shall have a different and sensitive approach to GBV related cases. Under SURP and SURP II, members of the GRCs have been trained on dealing with GBV related grievances and a female member of each GRC has been assigned to specifically deal with these: she will be closely working with female community engagement officers at the PIUs. This approach is applied in terms of all SURP II interventions. A GBV/Gender Specialist present at the PCU will assist the PIUs in dealing with all gender related issues.

In order to ensure anonymity, the PIUs have toll-free telephone numbers (**Table 6**) to register complaints. All calls to this number are received by the female community engagement officers. Providing toll free numbers in all the seven municipalities including Hargeisa, eases accessibility. Where such a case is reported to the GM, it should immediately be referred to the appropriate service providers, such as medical and psychological support, emergency accommodation, and any other necessary services with consent from the survivor or the guardian (in case of a minor). Data on GBV cases should not be collected through the GM unless operators have been trained on the empathetic, non-judgmental, and confidential collection of these complaints. Only the nature of the complaint (what the complainant says in her/his own words) and additional demographic data, such as age and gender, can be collected as usual. Annex 5 (GBV Action Plan) provides more detailed guidelines on the GBV and GM.

4.4 Disclosure of E&S Instruments

The original ESMF for SURP II and its Somali translation was disclosed in country and on WB website in September 2019. In line with the ESMF, subproject specific ESMPs were prepared, consulted upon and similarly disclosed for Baidoa (August 2020), Kismayo (March 2021), and Garowe (June 2021). The updated ESMF for SURP II and the AF1 and AF2 and its Somali translation was similarly disclosed in country and on WB website in April 2022. Likewise, in line with the updated ESMF, subproject ESMPs were prepared, consulted upon and similarly disclosed as follows: Beledweyne and Dhuusamareeb disclosed in June 2023; Mogadishu in September 2022, and Kismayo in October 2023. The second update of the revised ESMF, dated August 2024, was disclosed in a similar manner in August 2024, and for the activities under SURP II and its AFs, subproject specific ESMPs shall be prepared and disclosed. This third update of the

revised ESMF, dated August 2025, will be similarly disclosed in August 2025. The Hargeisa project team will translate the ESMF into Somali language and ensure that it is disseminated through appropriate channels, reaching both local communities especially the IDPs and other minority clans such as the Gabooye. The draft SEF was disclosed in April 2025, and the final version disclosed in July 2025.

5. POTENTIAL ENVIRONMENTAL AND SOCIAL BENEFITS, RISKS, IMPACTS AND MITIGATION MEASURES

5.1 Environmental and Social Risks Classification

The physical components of SURP II and its AFs are civil works related to the development and upgrading interventions on key urban infrastructure in the six cities. The impact of the civil works is expected to be small-scale, localized and reversible. There are, therefore, no significant or irreversible adverse environmental issues anticipated from the activities to be financed under SURP II AF4. However, given the significant security and SEA/SH risks, the overall environmental and social risks of the project continue to be classified as “High” under World Bank’s Environmental and Social Risk Classification (ESRC) system.

5.2 Environmental and Social Benefits

As in SURP I and the SURP II and its AFs thus far, the SURP II AF4 is expected to generate the following E&S benefits.

Expected environmental benefits:

- improved air quality due to reduced traffic congestion, better fuel economy and dust entrainment through better roads.
- reduced vehicle and accident hazards.
- improved pedestrian traffic safety because of better road quality and solar-powered streetlights and signage.
- reduced road flooding and reduced roadside erosion through drainage improvement.
- Opportunity to enhance locally lead and nature-based solutions (NBS), including planting native grasses and trees next to roads, to mitigate drought by lowering the urban heat Island effect
- Improved community health and safety through construction of urban infrastructure like culverts and storm water drainages
- Improved waste management once the waste management plan is formulated and implemented
- improved awareness and concern for environmental and social issues on the part of beneficiaries, and project staff;
- increasing the availability of staff conversant with environmental and social issues in Somaliland through training of staff as environmental and social management specialists in environmental and social screening, and
- awareness raising among senior Somaliland governmental staff on benefits of adopting environmental and social principles in sustainability of development projects, thus assisting in main streaming environmental and social issues in project planning and implementation.

Expected social benefits:

- improved community accessibility to schools, health care centres, and other livelihood activities through better roads.
- improved security and safety through improved walkways and streetlights.
- employment opportunities for the community through construction and maintenance of the municipal infrastructure, and inclusion of vulnerable or

disadvantaged groups-women, IDPs, persons with disabilities, youth and ethnic minorities.

- improved security of tenure and access to basic services.
- ramping up the local city and FMS's economies: materials for both the road works and the office and labouratory complex will be likely sourced from the cities, contributing to an economic upswing for suppliers, transporters, and the larger value chain. The materials will be sustainably sourced. In the sourcing of materials, due care will be taken to ensure that sensitive environmental receptors such as dry riverbeds and delicate coastal dunes will not be used as a source of materials for roadworks or for the other project-related construction activities.
- reduced vehicular maintenance cost.
- improved image of these important national and region cities and increase in property values along the newly built roads.
- improved government image and visibility incentivizing tax payments by the community.
- positive economic impact on livelihood and the businesses through better accessibility and improved security.

5.3 Environmental and Social Risks Envisaged

Environmental Risks

Because of the nature and relatively moderate scale of the works in urban environment under the project, the environmental impacts are minor, temporary, and confined to the area immediately surrounding the construction. Further, because of the scale of proposed investments within each municipality, cumulative effects of the project are likely to be insignificant. Anticipated environmental risks and impacts include:

- Increased levels of air pollution, particulate matter from dust, and emissions of noxious fumes and greenhouse gases caused by the operations of construction vehicles and heavy equipment.
- Water and soil pollution may be caused by accidental leaks/spills of oil/fuel from on-site construction facilities, equipment, or machinery, and accidental damage to septic tanks located on the RoW. Although water and soil contamination have not been encountered in the project thus far, the risks of surface water contamination would be higher in the project because of civil works in the vicinity of the Shabelle river in the riverine city of Beledweyne and drainage outfall points at or near shorelines of Mogadishu and Kismayo. The likelihood of having water wells near construction sites in the project cities also increases the risks of groundwater contamination.
- Adverse impacts on river and coastal ecosystem resulting from: (i) alterations of surface runoff through compaction of soils and increase in impermeable surfaces, (ii) changes to flow regimes of ephemeral streams and intermittent rivers (water velocity, depth, depositional patterns, and channel morphology) and, (iii) locating of outfall points at or near the shorelines of Mogadishu and Kismayo.
- Enhanced risk of flooding (especially in Beledweyne where the effects of climate change have led to increased instances of flooding) due to: (i) increased storm-water runoff resulting from reduction in infiltration rates following compaction of soils and surface paving, (ii) changes in surface water flow due to terrain modification during earthworks, and (iii) reduced water conveyance capacity as a result of increase in the volume of sediments.

- Excessive solid waste generation and inappropriate disposal. Solid waste management is poor across Somalia, and it can be a contentious issue in the project areas as observed in the rehabilitation of community roads under SURP II. Uncollected or improperly disposed garbage may cause foul odor, rodent and insect infestation leading to public health issues.
- Increased soil erosion and accompanying sedimentation caused by site terrain modification and loss of soil biodiversity due to contamination from chemical substances.
- Degradation of water quality due to the increase in the sediment loads of river Shabelle and the ephemeral streams.
- Stormwater drainage works on the roads may result in ponding at the outfalls, creating possible centers of infestation and diseases.
- Increased noise levels due to construction works and operation of vehicles and heavy equipment.
- Disruption or loss of biodiversity and natural landscape at burrow pit sites and at riparian locations which have an extensive wetland area due to sub-surface ponding during the frequent flooding episodes.
- Loss of some vegetation cover and trees- Ground disturbance, excavation would lead to removal of some existing trees and vegetation, affecting local landscape, increase erosion potentials in barren disturbed soil. These potential impacts can be minimized by limiting the land areas to be disturbed at the construction sites and landscaping using indigenous plant species. Transmission of infectious diseases among workers and other stakeholders, including HIV.
- exposure to communicable, water-borne, and sexually transmitted diseases due to interactions at subproject sites. Other risks involve;
- Risks related to traffic safety;
- Safety concerns related to drainage networks;
- unauthorized site access;
- Risks related to hazardous materials and chemicals, and
- Risks related to temperature fluctuations.

Subproject ESMPs and construction contract clauses for EHS management are used to manage these short-term environmental risks and impacts. In addition, these identified risks are prevented or mitigated with the adoption of standard operating procedures and good construction management practices. While some municipalities may contain some land with inherent environmental sensitivity, sensitive areas are excluded through robust environmental screening during the subproject selection process. The ESMP table (**Table 7**) in the next section presents mitigation measures that are applied and implemented under the SURP II and its AFs subprojects.

Social Risks

- Physical and economic displacement: The rehabilitation of urban infrastructure is expected to cause temporary physical and economical displacement. Those mostly affected will be roadside vendors and owners of temporary iron sheet kiosks infringing on the RoW.
- Unsafe and poor working conditions: The risks of unsafe and poor working conditions are high in Somalia as observed under SURP, including security risks.

- Community and workers' health and safety: Risks associated with construction/rehabilitation work.
- Forced and child labour: Although the risk of forced labour is low as seen in the project's implementation experience so far and indicated during stakeholder consultations, particular attention must be paid to child labour given its widespread use in Somaliland. Child labour remains a significant issue in Somaliland, where many children are engaged in various forms of work, often under hazardous conditions. Economic hardship and limited educational opportunities contribute to this problem, forcing families to rely on their children to contribute to household income. In urban areas, children may work as street vendors, helpers in shops, or in manual labour.
- Gender-based violence: The project will continue to strengthen case identification and adopt a comprehensive approach to address potential project-induced SEA/SH risks that may arise. The risks of GBVSEA/SH were assessed as "Substantial" at project preparation and throughout AF4 implementation, due to the contextual abuse of power and bullying in hiring, employment, and retention practices. There is also the risk that community conflict resolution approaches which lack confidentiality in handling such sensitive cases can stigmatize survivors who report SEA/SH experiences and potentially cause physical and psychological harm. Further, the preliminary stakeholder consultations pointed out the high GBV risk faced by internally displaced persons (IDPs) who live in the city peripheries with poor security lighting, hence exacerbating the risk of SEA.
- Exclusion of women and vulnerable groups from project benefits: gender discrimination in the construction industry is high in Somaliland where women working in the construction industry are looked down upon.
- Social tensions and security risks: Hargeisa is relatively stable with clan tension partly attributed to youth unemployment and resource allocation.
- Lack of inclusive and meaningful consultations, which are necessary to set the right tone for SURP II AF4.
- Labour influx and labour disputes over terms and conditions of employment.
- Risk of elite capture of the project's employment and other economic benefits.

These social risks will be mitigated through implementation of social instruments; adoption of mitigation measures proposed in WB Good Practice Notes on addressing SEA/SH; inclusion of disadvantaged groups in project activities/benefits including project-related job opportunities; effective stakeholder engagement (such as inclusive and transparent consultation process and functional GM); and measures to minimize social tensions. The ESMP table (**Table 7**), in the next section presents indicative mitigation measures that are being prepared and implemented under the project.

5.4 WB Climate Co-benefits of SURP II and the AFs 1,2 and 3

Somalia is the world's second most exposed country, when it comes to climate change and impacts thereof. For Somalia, the projections for temperature rise have the highest certainty. Somalia already records some of the highest mean annual temperatures worldwide. Hot conditions prevail throughout the year, in particular in the southwest near the border to Ethiopia, where annual mean temperatures surpass 29 °C. Depending on the climate change scenario, temperature in Somalia is projected to very likely rise between 1.4 - 1.9 °C by 2030, 1.5 - 2.3 °C by 2050 and 1.4 - 3.4 °C by 2080 compared to

pre-industrial levels, with coastal regions being less affected than the rest of the country. The annual number of very hot days (days with daily maximum temperature above 35°C) is projected to rise very strongly and with high certainty all over Somalia. Central Somalia will be particularly affected.

High exposure and limited adaptation capacities make Somalia highly vulnerable to the effects of climate change. Rising temperatures and the strong increase in very hot days will very likely result in a higher exposure to heatwaves in Somalia. Heat-related mortality will very likely rise to between 2.7 and 3.3 deaths per 100 000 people/year until 2030, reaching between 3.6 and 11.4 deaths per 100 000 people/year until 2080, depending on the emissions scenario.

Priority investments are (a) primary and secondary urban roads; (b) drainage; (c) pedestrian walkways and (d) streetlighting, which all have climate change adaptation and/or mitigation co-benefits. SURP II AF4 will have climate change ancillary benefits, as the paving of currently unsealed urban surfaces in the six cities will contribute to climate change adaptation. Once upgraded, the newly surfaced urban roads will contribute to mitigating traffic congestion and reducing air pollution substances such as oxides of sulphur and nitrogen, as well as CO₂, which are major contributors of climate change. In addition, the establishment of an agroforestry parklands with dense stands of mangrove trees on 12.75-ha in Kismayo is going to have both significant adaptation and mitigation benefits. Mangroves, like other coastal wetlands, are important organic carbon (OC) sinks. This provides a direct scenario of offsetting emissions in Somalia (and globally) through mangrove establishment, and the associated marine habitat, on a 12-ha piece of land in the coastal forest mosaic system of Kismayo. In addition, the mangroves in the proposed agroforestry parklands will play a key role by acting as sediment traps for runoff in the area around Kismayo. Mangroves and the related ecosystem that will develop over time, including seagrass, shall also filter pollutants, absorb excess nutrients from runoff, and trap sediments, helping to increase the clarity and quality of waters.

During the rainy season, the newly paved urban roads will have better resistance to flooding and will drain the water from the surface more easily, thus reducing the risk of potholes and water stagnation on the road surface. In the dry seasons (which account for a cumulative period of nine months every year, on average), the paved surface will reduce the risk of dust vortexes and its consequences on the population.

6. ENVIRONMENTAL AND SOCIAL MITIGATION PLAN

Based on the experience gained under the SURP and SURP II and its three AFs implementation periods, **Table 7** below presents indicative mitigation measures that are being prepared and implemented under SURP II and its AFs (including AF4) to address environmental and social risks and impacts of the project. For the social risks, **Table 7** should be read in conjunction with the updated SEF, RF and LMP, which include more in-depth risk assessment and mitigation measures on respective matters. The implementation of these measures is being monitored and reported through monitoring mechanisms as described in the following section. The effectiveness of these measures will be continuously reviewed and improved throughout project life. More details on site-specific environmental and social monitoring indicators will be established in subproject specific ESMPs.

Table 7: Indicative Environmental and Social Mitigation Plan

Potential E&S risks and Impacts	Proposed Mitigation Measures	Indicators For Monitoring
Security Risks	<ul style="list-style-type: none"> • Prepare and implement Security Management Plans (SMPs) in each municipality including in Hargeisa in line with ESS4 and WB Good Practice Note (GPN) on the use of security personnel including Code of Conduct (CoC), incident reporting, grievance redress and training/awareness-raising for security officers on the principles of proportionality in the use of force. • Close coordination with security authorities and local communities. • Deploy police officers to provide site security for the workers and deploy undercover police officers where necessary. • Active use of remote monitoring tools, and cautious management of project visibility e.g., public display of project information such as signboards at works sites. • Carry out consultations in small numbers at the district offices and also through the telephone when necessary. • Minimize the time spent collecting census data and avoiding predictability in the sequencing of data collection locations. • Use of Apps such as KOBO to help in speedy collection of easily verifiable data. 	<ul style="list-style-type: none"> • # of reported insecurity incidents.

Potential E&S risks and Impacts	Proposed Mitigation Measures	Indicators For Monitoring
Noise Pollution	<ul style="list-style-type: none"> • Restrict construction working hours between 7am to 5pm. • Educate workers on noise reduction measures. • Ensure an effective routine maintenance for construction vehicles and machinery. • Consideration, if necessary, of specific noise control measures for works near sensitive receptors (e.g., schools, health clinics and hospitals, etc.). • Selecting equipment with lower sound power levels e.g., the use of hand drilling machines. • Installing suitable mufflers on engine exhausts and compressor components in cases where the service provider uses generators. • Provide fit for work Personal Protective Equipment (PPEs) such as ear plug/ earmuffs for all workers involved in the areas with elevated noise levels. • The contractor should use equipment that are in good working condition and are periodically serviced. • Ensure that noise and excessive vibration from construction activities are within permissible levels as per the provisions of World Bank's OHS guidelines: this includes among others adhering to permissible noise and vibration level • Map out zones with noise levels above 85 dB(A) ²²and install safety signage on restrictions and use of noise mufflers. 	<ul style="list-style-type: none"> • # of Recorded cases of complaints by the project workers and community members.
Fire hazards, especially in the PIU offices and in the materials testing laboratories	<ul style="list-style-type: none"> • Provide fire hazard training to construction workers. • Provide fire extinguishers. • Designate areas as "assembly points". • Establish where possible, live fire breaks in form of appropriate vegetation especially for the IDP camps. • Formulate emergency preparedness and response plans and conduct drills to test the plans 	<ul style="list-style-type: none"> • # of fire extinguishers installed. • # of assembly points designated.
Air Pollution	<ul style="list-style-type: none"> • Educate workers about air pollution impacts from construction activities on human health, and good practices to avoid, reduce and mitigate. 	<ul style="list-style-type: none"> • # of complaints related to air pollution.

²²General WB EHS guidelines

Potential E&S risks and Impacts	Proposed Mitigation Measures	Indicators For Monitoring
	<ul style="list-style-type: none"> • As feasible, minimize the amount of time of areas of exposed soil (source of particulate material). • Sprinkle water on exposed road surfaces as appropriate. • Proper storage of road base materials (e.g., soil, gravel, etc.). • Covering road base material and construction waste soil/material transport trucks with tarpaulin or other heavy material to control dust emission and spillage hazards. • No unnecessary idling during operation of vehicles and machines. • Regular and effective maintenance for construction vehicles and machineries to ensure that they are in good working condition. • No unauthorized slash-and-burn activity. 	
Water Pollution	<ul style="list-style-type: none"> • Educate workers about chemical hazards and safety. • Proper handling and storage of contaminants. • Proper waste management. • Avoid dumping and burial of waste in permeable soils and near water supply sources. • Proper soil erosion controls and management, especially in areas with streams and rivers. • Emergency procedure to control storm water and soil erosion during significant rain fall events or flooding. • Careful measures taken not to pollute boreholes, streams, and other water sources. • Maintain register of any significant releases into surface or ground water. • 	<ul style="list-style-type: none"> • # of complaints or incidents recorded.
Soil Pollution	<ul style="list-style-type: none"> • Educate workers about chemical hazards. • Proper chemical, material and waste handling and storage. • Effective vehicular and machinery maintenance. • Maintain a register of any chemical or petroleum spills. • Ensure proper site cleanup and closure upon completion of construction. 	<ul style="list-style-type: none"> • # of incidents recorded. • # of grievances registered.
Loss Of Flora and Fauna	<ul style="list-style-type: none"> • Minimize unnecessary vegetation clearance. • Where vegetation/trees are cut down, plant replacement. 	<ul style="list-style-type: none"> • # of trees cut and planted.

Potential E&S risks and Impacts	Proposed Mitigation Measures	Indicators For Monitoring
	<ul style="list-style-type: none"> • Sensitize workers about fauna conservation. • Discourage fauna killings and set penalties for killing them. • Revegetate roadsides with native grass species and plant trees to mitigate drought by lowering the urban heat Island effect and control soil erosion. 	<ul style="list-style-type: none"> • # of grievances recorded. • Records of sensitization workshops.
Generation Of Solid Waste	<ul style="list-style-type: none"> • Contractors appointed under this project will be required to develop project Environmental and Social Assessment and Management Plans, which will include area specific waste management, capturing waste volumes and categories expected from the projects. • The contractors will be responsible for instituting and implementing a simple waste tracking system allows for the identification of current waste streams while determining how much waste is being generated from each facility. • Practice waste minimization segregation and proper disposal according to internationally accepted guidelines and (where possible) municipal bylaws. • Reuse construction waste for landscaping and backfilling. • The contractors will be responsible for keeping documentation showing details of interventions put in place for tracking, measuring and optimizing wastes and recycling processes as appropriate. • Educate workers about proper waste collection, storage and disposal. • Preparation of waste management plan for each waste stream and implementation of the waste hierarchy, as part of the subproject ESMPs. • Disposal of project-generated wastes at Municipality approved sites only. • The contractors shall ensure provision of waste bins at the project sites in the six cities to handle wastes generated. • Efficient use of materials to as much as possible avoid and minimize waste production. • Ensure waste are recycled/reused before opting to dispose. • Use of durable, long-lasting materials that shall not need to be replaced often. 	<ul style="list-style-type: none"> • # of waste bins at the sites. • # of waste management plans. • Volume of total waste generated. • % of waste collected.

Potential E&S risks and Impacts	Proposed Mitigation Measures	Indicators For Monitoring
	<ul style="list-style-type: none"> Ensure waste is collected and disposed in accordance with Somalia government regulations. 	
High risk flooding due to torrential rainfall during the two annual rainy seasons	<ul style="list-style-type: none"> Improved drainage infrastructure to ensure runoff and stormwater conveyance, Climate-informed hydrologic and hydraulic analysis applied to all urban infrastructure designs. Disaster risk assessments and management as part of the project feasibility and designs. Capacity building of the municipality on urban drainage, flood risk management (FRM) and preparedness, including long-term operation and maintenance (O&M). Construction of storm water drainages especially targeting the vulnerable IDP camps. Construction of water retention ponds and small water dams.. Re-vegetation of exposed areas using native grass and tree species 	<ul style="list-style-type: none"> Length of storm drainages. Number of retention ponds and small water dams constructed. Acreage revegetated. Capacity building reports.
High temperature fluctuations	<ul style="list-style-type: none"> AF4 activities in Hargeisa will promote greening of the city, including tree planting to help absorb urban heat, capture carbon, and support drainage. Workers to have hydration breaks. 	<ul style="list-style-type: none"> Acreage of area greened and number of trees planted.
Occupational Health and Safety (OHS)	<ul style="list-style-type: none"> Select legitimate and reliable contractors through screening OHS records. Address OHS risks with non-compliance remedies in procurement documents. Proper and effective contractor OHS plan (included in the C-ESMP) to be in place that meets applicable Somalia requirements and World Bank ESS2 and World Bank Environmental and Health and Safety General Guideline requirements. The contractor shall always provide the workers with the required PPE and enforce their use while at the work sites. Provide drinking water. 	<ul style="list-style-type: none"> Accident logs. First aid kits present in work sites. Fire extinguishers present in work sites. Insurance policy and records of insurance coverage.

Potential E&S risks and Impacts	Proposed Mitigation Measures	Indicators For Monitoring
	<ul style="list-style-type: none"> • The equipment used in the works should be routinely serviced to ensure proper and safe equipment functionality. • Carry out Job Risk Assessments (analysis of hazards likely to occur and precautions need to be undertaken) before executing the construction. • Use of safety signage “MEN/WOMEN AT WORK” to warn contractor workers and visitors to worksites. • Provision of adequate signage and communication of risk to workers and communities. • Training and use of fall prevention devices, such as rails, full body harnesses and energy absorbing lanyards, when working at heights. • Electrical works should be performed by trained and qualified experts. • Ensure that electrical equipment is properly connected before switching on sockets. • In case of any spillage at working areas, this should be cleaned off immediately, anti-slip hazard warning when mopping floors should be provided to reduce on chances on slip and falls. • Provide insurance coverage for all project workers. • Site construction layout and planning to help minimize potential project OHS risks. • Safety induction for workers during induction process. • Ongoing OHS training for workers and specialized OHS training for workers with specific risks (e.g., heavy equipment operators, welding, hazardous materials, etc.). • OHS Officer should be on site to implement OHS requirements proper PPE provided for workers. • Provision of sanitary facilities for workers. • Separate toilets and change rooms for male and female employees. • Worker health screening and monitoring where appropriate. • Maintain onsite appropriate first aid and other equipment associated with the level of worker OHS risk and establish procedure to transport of injured worker to nearby hospital. • Ongoing monitoring and reporting of OHS performance. 	<ul style="list-style-type: none"> • Use of PPE by workers. • Trainings records. • Presence of drinking water supply.

Potential E&S risks and Impacts	Proposed Mitigation Measures	Indicators For Monitoring
	<ul style="list-style-type: none"> • Proper investigation of all worker accidents or project-related health issues, including documentation of investigation results and as needed implementation of corrective measures. • Establish emergency plan/procedure in case of emergencies such as chemical spills, fires, explosions, flooding. 	
Spread Of Infectious Diseases	<ul style="list-style-type: none"> • Recruit locally through the GRCs. • Provide adequate transportation to site (prevent overcrowding). • Increase worker health awareness e.g. hygiene and sanitation. • Employ a site health care professional. • Discuss health issues during GRC and community consultations. 	<ul style="list-style-type: none"> • Infectious diseases logs.
Traffic And Road Safety	<ul style="list-style-type: none"> • Good and effective Traffic Management Plan, including at macro and micro level and consideration of pedestrians. • Use of competent drivers with defensive driving techniques. • Respective PIUs shall regularly inspect vehicle safety and maintenance. • All fleet handling deliveries shall observe speeds limits to a maximum of 80km/h out of major towns but 30kms in the built-up areas in the six municipalities. • All drivers and loaders shall sign the CoC. • Drivers (especially going to high insecurity areas) shall follow guidance on safe emergency driving. • Public notification for planned road closures, road diversions, and construction works. • Information to directly affected local population on potential safety risks from pedestrian movements. • Provide alternative route (detour) if technically and financially feasible. • Take appropriate safety measures, which are technically and financially feasible, to avoid the occurrence of incidents and injuries to members of the public associated with the operation of construction equipment. • Install and maintain traffic and construction signs and controls. • Safe driving awareness for construction drivers. 	<ul style="list-style-type: none"> • # of accidents recorded. • # Vehicle inspection reports. • Trip Management Plans.

Potential E&S risks and Impacts	Proposed Mitigation Measures	Indicators For Monitoring
	<ul style="list-style-type: none"> • Clearance of road and footpath from construction wastes, materials, or equipment. • As appropriate, separate work areas from public spaces/areas through use of barriers, fencing and signs highlighting potential risks or limitations. • In case of project related traffic or pedestrian accident, implement adequate accident investigation procedure (reporting, cause assessment, corrective measures as appropriate, etc.). 	
Poor Management of ESHS Risks, As Well As Risks to Community Health and Safety	<ul style="list-style-type: none"> • Establish and maintain continuous liaison with the urban communities in the six municipalities in which SURP II and its AFs project activities are implemented, including sensitization on ESHS risks and mitigation measures. • Use of local language and images for ESHS signage shall be encouraged. • Ensure proper and adequate provision of sanitation and waste management facilities at all construction sites. • Selected construction staff to be trained on EHS monitoring during civil works. • Install fence or barriers to limit public access where necessary. 	<ul style="list-style-type: none"> • # of ESHS incidents occurring.
Management Of Chemicals and Hazardous Materials/waste	<ul style="list-style-type: none"> • Educate workers about proper management of chemicals, hazardous materials, and waste management (use, storage, and waste collection, storage, and disposal). • Provide material safety data sheets and the point of use. • Train workers on first aid and provide necessary supplies for response to chemical hazards. • Waste separation and segregation to be undertaken by competent and well-trained staff only. • Provide necessary PPE to workers and other equipment for chemical hazardous material use. • Provide proper storage area for temporary storage of chemicals and hazardous materials. • Construct bund walls to contain any spills in oil and chemical storage areas. • Provide appropriate firefighting equipment's near the oil and chemical storage area. • If pesticides are used, for example for pest control at construction storage area or work camp, ensure not to use any pesticide products that contain active ingredients that are restricted under applicable international conventions or their protocols. 	<ul style="list-style-type: none"> • # of waste management plans. • Volume of total waste generated. • % of waste collected. • Training records.

Potential E&S risks and Impacts	Proposed Mitigation Measures	Indicators For Monitoring
	<ul style="list-style-type: none"> • Provide waste bins and procedure for collection, temporary storage and disposal of chemical and hazardous wastes including waste oils and petroleum products, batteries, contaminated soil, empty chemical or hazardous material containers, etc. • Disposal of project-generated hazardous wastes at Municipality approved sites only. • Ensure proper cleanup and closure upon completion of work. 	
<p>Other labour risks beyond occupational health and safety include:</p> <p>i) labour influx,</p> <p>ii) social tensions,</p> <p>iii) labour disputes over terms and conditions of employment,</p> <p>iv) risks of child labour,</p> <p>v) discrimination and exclusion of disadvantaged or vulnerable groups.</p>	<p>Implement the LMP including the following:</p> <ul style="list-style-type: none"> • all contracts shall have contractual provisions to comply with the minimum age requirements including penalties for non-compliance. The contractor is required to maintain labour registry of all contracted workers with age verification. Verification of the age shall be undertaken prior to the engagement of labour and documented. • The employment of project workers will be based on the principle of equal opportunity and fair treatment, and there will be no discrimination with respect to any aspects of the employment relationship. • Contractually require the contractor to preferentially recruit unskilled labour from the local communities and nearby areas with priority given to hiring of qualified members of project affected households, female community members, local residents, and IDPs. • Ensure fair terms and employment conditions consistent with national Labour Code in contracts. • Develop and operationalize GMs for project workers (direct workers and contracted workers) to promptly address their workplace grievance. • Relevant trainings provided to workers, such as induction and daily toolbox talks outlining expected conduct and local community values, customs, and traditions. • Develop remedial procedures to deal with child labour incidents as detailed in the LMP (Where a young-looking person's age cannot be confirmed, use the GRC members from the area for age verification; assigning non-hazardous work for the child; employing adult family member; continue to pay the wage without work). 	<ul style="list-style-type: none"> • Labour registry with breakdown information of project workers (age, gender, contact info, etc.) • # of reported cases of disputes by workers. • Review of employment contracts.
Physical And Economic Displacement	<p>Comply with the RPF, including the following:</p> <ul style="list-style-type: none"> • Prepare and implement the RAPs subject to WB approval, for each of the subprojects with significant resettlement issues. 	<ul style="list-style-type: none"> • Clearance and public disclosure of the RAP.

Potential E&S risks and Impacts	Proposed Mitigation Measures	Indicators For Monitoring
	<ul style="list-style-type: none"> • Ensure all resettlement issues are resolved prior to the start of construction (including payment of compensation). • Avoid and minimize displacement through project selection and design processes. • Awareness raising and sensitising officials on ESS5 to establish client buy-in. • Regular review of the contractor work-plan. • Additional compensation as provided for in the RPF in case of additional delays. • Secure funding for compensation immediately after RAP approval to and depositing this money in a designated bank account. • Prior to handing-over of roads/site to the contractor ensure the RAP has been implemented and attach an indication of this to the right to proceed document provided to the contractor. • Ensure involvement of affected communities in the verification process. 	<ul style="list-style-type: none"> • RAP completion report with evidence of compensation payment. • Grievances recorded.
SEA/SH And Other Forms of GBV	<p>Implement the GBV Action Plan (see Annex 5) including the following:</p> <ul style="list-style-type: none"> • Hiring of a GBV Specialist in the PCU for the project implementation and monitoring. • Sensitize target communities and project workers on GBV/SEA-SH risks and protocols. • Contractor should put in place labour management plan to mitigate the social risks (such as GBV-SEA/SH and spread of HIV/AIDs and other communicable diseases) emanating from influx of workers (workers from outside sub project sites). • Codes of conduct (CoC) for project contractors and workers; and plan for sensitization/awareness raising for the community and intended training activities for workers on CoC and SEA provisions. • Mapping and partnership with identified GBV service providers. • A Reporting and Response Framework that outlines key requirements for reporting cases if they arise and measures to enable safe, ethical, survivor-centred response. • An Accountability Framework that outlines how the PIU/contractor will handle allegations, including related to investigation (in alignment with national processes) and sanctions for potential perpetrators. • Establishment of special channel/procedures for safe, confidential reporting of GBV incidence that connect to the project GM and enable training of GM operators on how to respond to cases that come forward. 	<ul style="list-style-type: none"> • Progress report of the GBV Action Plan. • # of female workers engaged in each subproject.

Potential E&S risks and Impacts	Proposed Mitigation Measures	Indicators For Monitoring
	<ul style="list-style-type: none"> • Development of additional protection measures to address potential sexual harassment in recruitment practices and in the workplace. • Clarification of GBV requirements in bidding documents (including requirements for CoCs, training of workers, and how GBV related costs will be covered in the contract); bid evaluation to include consideration for GBV response proposal. • Engagement of female workers in project civil work. • Provide sufficient sex segregated toilets and washing facilities. 	
Lack of Inclusive Stakeholder Engagement	<p>Implement the SEF, including the following:</p> <ul style="list-style-type: none"> • Identify disadvantage groups in each subproject SEP. • Establish and maintain continuous liaison with the communities including disadvantaged groups. • Ensure timely mobilization, and inclusion of all community segments and other key stakeholders in the consultation and information disclosure sessions. • Facilitate the participation of vulnerable groups to consultations (such as provision of transportation and accessible venues). • Ensure timely and prior disclosure and dissemination of relevant and easily accessible project information, in relevant local languages to ensure all community segments can effectively participate in sub-project implementation. • Establish GRCs involving vulnerable groups. • Inform and sensitize all stakeholders on accessible GM. • Regularly engage the FMSs ministries of public works as per the project implementation manual. • Consider and respond to stakeholder feedback and concerns promptly. • Document and disclose all community consultation fora clearly, providing signed minutes and lists of attendance, verbatim discussions, key relevant concerns raised, and feedback given to communities, key conclusions and agreements reached. 	<ul style="list-style-type: none"> • # of disadvantaged groups consulted. • # of disadvantaged groups in the GRC. • Functionality of GM (review of grievance logs and actions taken). • # of steering committee member meetings held.
Inadequate Capacity	<ul style="list-style-type: none"> • Ensure the municipalities especially in Hargeisa -have adequate and qualified E&S focal persons, including social specialists, community liaison officers, consultants, as necessary throughout the project cycle etc 	<ul style="list-style-type: none"> • Training needs assessment report. • Training protocols.

Potential E&S risks and Impacts	Proposed Mitigation Measures	Indicators For Monitoring
	<ul style="list-style-type: none"> • Undertake a training needs assessment for all the PIUs and relevant stakeholders (such as municipality officials, GRC members, contractors, and project workers). • Identify suitable and tailor-made courses for the technical teams. • Facilitate capacity building efforts for the project team. • Monitor performance and provide continuous technical support to the PIU. • Allocate adequate budget for E&S risk management actions throughout the project cycle. 	<ul style="list-style-type: none"> • List of staff trained.

7. ENVIRONMENTAL AND SOCIAL INSTRUMENTS, CONTRACTOR MANAGEMENT

7.1 Framework Instruments

As required in the **Environmental and Social Commitment Plan (ESCP)** of the project, the following environmental and social instruments have been updated to enhance management of E&S risks associated with AF4 activities. These instruments will be implemented and monitored throughout the project life:

- This **Environmental and Social Management Framework (ESMF)**, which has been prepared and updated in accordance with the procedures set in place by the World Bank. Under the aegis of this ESMF, subproject-specific ESMPs will be further prepared and submitted for review, concurrence, and clearance by the World Bank. The ESMF and the ESS4 Good Practice Note (GPN) on the Use of Security Personnel include the guidelines for subproject-specific Security Management Plans (SMPs).
- An updated **Resettlement Policy Framework (RPF)**, which has been prepared in accordance with ESS5, ensures that appropriate measures are in place to address any issues that might arise from potential land acquisition and/or economic displacement under the project in all the seven cities including Hargeisa. **Resettlement Action Plans (RAPs)** are prepared/updated in accordance with the updated RPF once specific investments are identified in each city.
- An updated **Stakeholder Engagement Framework (SEF)**, which has been prepared in accordance with ESS10, reviewed by the Bank and disclosed in-country. The SEF includes stakeholder identification and analysis summary, plans for engagement (e.g., type, regularity, etc.), communication activities and grievance redress mechanisms. The SEF outlines both the initial and ongoing process by which stakeholders will be engaged to ensure the design of the project aligns with stakeholders current and ongoing needs. The existing city specific SEPs, which are part of the omnibus ESMPs, and informed by the SEF, will be updated. Similarly, a separate SEP for Hargeisa municipality will be prepared in line with the revised SURP II AF4 SEF
- An updated **Labour Management Procedures (LMP)**, which have been developed in accordance with ESS2, outlines requirements for project workers on labour and working conditions. City specific labour plans (including Hargeisa), which are part of the omnibus ESMPs and informed by the LMP, will be updated.
- **GBV Action Plan** which has been developed to address risks related to SEA and SH (see Annex 5). The GBV Action Plan has been updated to reflect, among others, the changes to the SEA/SH Risk rating which has been assessed downwards from High to Substantial.

Based on these E&S framework instruments, the municipalities and their PIUs (including Hargeisa) will prepare and implement subproject-specific instruments, including ESMPs (or ESIA in limited cases), SEPs, RAPs, LMPs and SMPs.

7.2 E&S Instruments for Subprojects

Step 1: Environmental and social screening. Screening is the process of identifying whether a closer, more comprehensive, and formal assessment of environmental and social impacts is necessary or not. The procedure is used to determine whether a proposed subproject activity is likely to have significant effects on the environment and social systems. The subproject screening process will also exclude sensitive areas, including biodiversity hotspots and seasonal water streams, to ensure that ecological processes are not interfered with. An indicative environmental and social screening checklist is attached in Annex 2 to be used by the PIUs in the six municipalities. The PIUs, especially the environmental and social specialists, will closely undertake environmental and social screening to determine the potential risks and impacts of subprojects. The E&S screening will be undertaken together with the **project designing process** (including feasibility studies and detailed engineering design) to inform the project design and avoid/minimize environmental and social impacts.

Step 2: Development of E&S instruments. Based on the findings of the environmental and social screening, the PIUs develop environmental and social instruments for subprojects.

Step 3: Review, approval and public disclosure. The draft environmental and social instruments prepared will be submitted to the PCU who will review and in turn forward these draft documents to the World Bank ESF team supporting this project. The WB will internally review the submitted instruments. After WB clearance, the instruments are publicly disclosed in-country on the Ministry of Public Works external website²³ as well as the World Bank's website.

Step 4: Implementation, monitoring/reporting and contractor management. The PIUs in the seven cities will ensure that specific E&S requirements are incorporated into **procurement processes** (including bidding document and contracts) with appropriate non-compliance remedies. The PIUs will provide contractors at bidding stage with a complete package of environmental and social instruments, including this updated ESMF. Contractor-ESMPs/LMPs (C-ESMPs) including labour recruitment plans (LRP and occupational health and safety management plans are subject to prior review and approval by PIUs before the start of civil works. Contractors are contractually bound to ensure that the E&S measures are implemented and reported as accurately and adequately as possible in the course of the construction activities supported by the project. The PIUs and supervision consultants will **ensure that the contractor manage and monitor/report on the following environmental and social issues in their subprojects** (more details on the contractor management are provided in the updated LMP):

- **Safety:** hours worked, recordable incidents (lost time incidents, medical treatment cases), first aid cases, high potential near misses, and remedial and preventive activities required (for example, revised job safety analysis, new or different equipment, skills training, and so forth).
- **Environmental incidents and near misses:** environmental incidents and high potential near misses and how they have been addressed and lessons learned.
- **Major works:** those undertaken and completed, progress against project schedule, and key work areas.

²³ <https://mpwr.gov.so/2024/02/02/sef-nagaad-surp-ii-third-af-p181512-feb-2024/>

- **E&S compliance:** noncompliance incidents with permits and national law (legal noncompliance), project commitments, or other E&S requirements.
- **E&S inspections and audits:** by contractor, engineer, or others, including authorities—to include date, inspector or auditor name, sites visited, and records reviewed, major findings, and actions taken.
- **Labour registry:** number of workers, indication of origin (local, non-local nationals, international IDPs), gender, age with evidence that no child labour is involved, and skill level (unskilled, skilled, supervisory, professional, management).
- **Training on E&S issues:** including dates, number of trainees, and topics.
- **Footprint management:** details of any work outside boundaries or major off-site impacts caused by ongoing construction—to include date, location, impacts, and actions taken.
- **Stakeholder engagement:** record of formal and informal meetings, and information disclosure and dissemination—to include a breakdown of women and men consulted and issues coming from various stakeholder groups, including vulnerable groups (e.g., women, disabled, elderly, etc.).
- **Security risks:** details of risks the contractor are exposed to while performing its work.
- **Worker grievances:** details including occurrence date, grievance, and date submitted; actions taken and dates; resolution (if any) and date; and follow-up yet to be taken.
- **Community grievances:** grievance and date submitted, action(s) taken and date(s), resolution (if any) and date, and follow-up yet to be taken.
- **Major changes** to contractor's environmental and social practices.
- **Deficiency and performance management:** actions taken in response to previous notices of deficiency or observations regarding E&S performance and/or plans for actions to be taken.
- **Incidences of GBV** reported and actions taken.
- **Fatality and serious incidents.** In the event of an occupational fatality or serious injury, the contractor shall report to the PIUs as soon as becoming aware of such incidents and inform the government authorities (where available) in accordance with national reporting requirements. Corrective actions shall be implemented in response to project-related incidents or accidents. The PIU or, where relevant, the contractor, will be required to conduct a root cause analysis for designing and implementing further corrective actions.

The monitoring responsibility, frequency and means of monitoring are indicated in **Table 8** below. More details will be specified in the ESMP of each subproject.

Table 8: Monitoring Responsibility, Frequency and Means

Responsible entity	Frequency of monitoring report	Means of monitoring
Contractor	Daily recording with monthly reporting to ESC and PIU	Daily recording on the above E&S issues by the Environmental and Social Specialist based at the PIU and site manager

Responsible entity	Frequency of monitoring report	Means of monitoring
ESC	Daily recording with monthly reporting to PCU	Daily recording on the above E&S issues by the ESC Environmental and Social Interviews with project workers and affected communities
PIUs and PCU	Quarterly reporting to WB	Interviews with project workers and affected communities
TPM	As agreed with the WB	Unannounced spot checks through site visits Interviews with project workers and affected communities

7.3 Exclusion List

All proposed activities shall be screened by the PIUs to ensure that they are within the boundaries of the project's eligible activities. A screening report is prepared and shared with the World Bank ESF team and joint reviews of the findings of the report conducted. The following criteria shall be applied to exclude activities and subprojects from financing by SURP II and AFs during the E&S screening exercise. These are:

- Activities that have a high probability of causing serious adverse effects to human health and to the environment.
- Activities that may adversely affect lands or rights of other vulnerable and marginalized groups.
- Associated facilities which do not meet the requirements of the ESSs, whether the beneficiaries have, or do not have control or influence over such associated facilities.
- Activities that may have significant adverse social impacts or may give rise to significant social and community conflicts.
- Subprojects and activities with either adverse impacts on land or natural resources under traditional or customary land use or have risks associated with the relocation of vulnerable and marginalized communities, coupled with any negative impact on their cultural sites or heritage.
- Activities that involve sites with high biodiversity values, or have impacts on biodiversity, critical habitats and protected areas.

8. ROLES AND RESPONSIBILITIES OF IMPLEMENTING ENTITIES

8.1 Project Implementation and Coordination Units (PIUs and PCU)

The SURP II and its AFs will continue to be implemented by municipal governments in the cities of Mogadishu, Garowe, Baidoa, Kismayo, Beledweyne, and Dhuusamareeb through the existing competitively recruited PIUs that are directly reporting to their respective mayors. The first six PIUs are already staffed with a Project Coordinator, Finance Specialist, Procurement Specialist, Environment and Social Specialist, Community Engagement Officer(s), Project Engineer, and a Monitoring and Evaluation Specialist. The Hargeisa PIU will be established and also staffed with specialists with similar competencies necessary for E&S risk management. The PIUs have overall project implementation responsibility including:

- Ensuring compliance with World Bank ESSs and other relevant country laws as contained in this ESMF.
- Support the smooth and efficient implementation of SURP II and its AFs.
- Ensure effective preparation, review, approval and implementation of ESMPs (and associated instruments) based on this ESMF.

The PCU established at the federal Ministry of Public Works supports the PIUs in all the municipalities. The PCU consists of a Project Coordinator, a Procurement Specialist, a Financial Management Specialist, an Environmental and Social Specialist, a GBV/Gender Specialist, a Monitoring and Evaluation Specialist, an Engineer, and a Finance and Admin Officer. PCU roles and responsibilities include providing capacity building support to the PIUs as needed, doing quality assurance on preparation of new E&S documents and spot checks on E&S implementation and monitoring by the six cities targeted under SURP II and the AFs.

8.2 PIU Environmental and Social Specialists

The Environmental and Social Specialists at the respective PIUs will specifically:

- Carry out E&S screening of subprojects.
- Manage the preparation and implementation of all ESIAs/ESMPs and other E&S instruments (RAPs, LMPs etc) assisted by environmental and social consultants to ensure compliance to the World Bank Environment and Social Standards.
- Establish and ensure functionality of the GM.
- Ensure that the SURP II and the AFs project design, specifications and budget adequately reflect the recommendations of the ESIAs/ESMPs.
- Review and approve the Contractor's ESMP and LMP.
- Prepare regular monthly/quarterly/semi-annual progress reports with statutory requirements.
- Develop, organise and deliver appropriate environment and social risk management related training courses for the PIU staff, contractors, local government/community representatives and others involved in the project implementation.

- Liaise with the Contractors and the PIU/MDAs on implementation of the ESMPs.
- Liaise with various Government agencies on environmental, resettlement and other regulatory matters.
- Continuously interact with relevant NGOs and community groups.
- Establish dialogue with the affected communities and ensure that the environmental and social concerns and suggestions are incorporated and implemented in the project.
- Review the performance of the project in terms of environment and social risk management, through an assessment of the periodic internal monthly and quarterly environmental and social monitoring reports; provide summaries of same and initiate necessary follow-up actions.
- Provide support and assistance to the Government MDAs and the World Bank during Project Review Missions.
- Immediately report to PCU and the Bank any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers.

8.3 Roles and responsibilities of Municipalities

The seven municipalities and their associated government MDAs will oversee the implementation of the SURP II and its AFs. Their roles and responsibilities are enumerated below.

- Establish and maintain, the PIUs including the one in Hargeisa.
- Take the lead in screening, scoping, review of draft ESIAs/ESMPs for the government, receiving comments from stakeholders during public hearing of SURP II AF activities.
- Convening a technical decision-making panel (if required), ensuring conformity with applicable standards, conduct environmental and social liability investigations, and perform monitoring and evaluation work.
- Provide overall leadership during public consultation meetings with critical project stakeholders, in order to gain their support/cooperation/consensus in established policy direction.
- Ensure that project implementers comply with all relevant environmental laws and policies.

8.4 The Contractor and the Engineering and Supervising Consultant

The contractor engaged for civil works under the project will be responsible for the following:

- Employ or appoint qualified environmental, social, occupational health and safety expert(s) to manage ESHS issues.
- Prepare and implement their labour management procedure (Contractor's LMP) and Contractor's ESMP (including OHS provisions) which will apply to the contracted workers who work on the project. These procedures and plans will be submitted to the PIU for review and approval before the contractor is allowed to mobilize to the field (Annex 7 provides indicative E&S mitigations that can be useful in preparing the C-ESMP).
- Involve the PIU and GRCs in the recruitment of casual workers.

- Supervise their subcontractors to ensure adherence to the LMP, ESMP and C-ESMP.
- Maintain records of recruitment and employment of contracted workers (including subcontractors) with age verification to avoid child labour.
- Provide induction and regular training to contracted workers on environmental, social and occupational health and safety issues, including training to workers exposed to specific risks associated with their work and keep records of these trainings.
- Require the primary supplier to identify and address risks of child labour, forced labour and serious safety issues for primary supply workers.
- Develop and implement the grievance mechanism for contracted workers, including ensuring that grievances received from their contracted workers are resolved promptly, and reporting the status of grievances and resolutions. The GM should include channels for safe, confidential reporting of any SEA/H and GBV cases.
- Ensure that all contractor and subcontractor workers understand and sign the CoC prior to the commencement of works, take all other measures to address risks of SEA/SH as specified in the contractor's LMP/ESMP and supervise compliance with such measures.
- Ensure provision of water, sanitation, and hygiene facilities including separate toilets and changing rooms for female workers.
- Ensure first aid facilities and appropriate PPE for workers at the sites given the specific worker OHS risks.
- Immediately report to PIU on labour issues, OHS accident, or significant environmental event (e.g., spill, release, emergency), any chance-find during project implementation.
- Report to PIU on labour and occupational health and safety performance.
- Participate in the induction training on ESMP provisions and requirements delivered by the PIU. Ensure that all workers, including site supervisors and management participate in training sessions delivered by PIU.
- Based on the results of C-ESMP monitoring, cooperate with the PIU and Supervision Consultant to implement environmental and social corrective actions and plans, as necessary.
- Respond promptly and efficiently to requests and instructions from PIU for environmental corrective actions and implement additional environmental and social mitigation measures, as necessary.
- Coordinate with PIU to deal with any complaints during project implementation.
- Collaborate with the local government to follow project agreements on material sourcing, schedules for utility disruption, work schedules and waste utilization plan; and
- The C-ESMPs will include specific mitigation measures based on the ESMP, the final design, the proposed work method statements, the nature of the project site, etc. They will also be informed by the work risk assessment and impacts identified by the ESMP. Primarily the C-ESMP will include but not limited to:
 - child protection strategy.
 - labour influx management plan.
 - workers' camp & accommodation management plans (if contractors retain a construction camp).

- gender-based violence action plan including an accountability and response framework.
- stakeholder engagement plan.
- emergency response plan.
- waste management plan.
- occupational health and safety management plan.
- water resources management plan.
- EHS code of conduct.
- site layout and material management plan.
- traffic management plan.
- chance find management plans.

The Engineering and Supervising Consultant. The PIUs will be supported by ESC who will be responsible for the following:

- Employ or appoint qualified environmental, social, occupational health and safety expert(s) to manage ESHS issues. Have a social /environmental specialist in the team with GBV specific skills to supervise issues related to GBV (e.g., supervise signing of Codes of Conduct (CoCs), verify working GM for GBV is in place, refer cases where needed) and work with GBV Services Providers as entry points into service provision to raise awareness of the GM.
- Provide day to day construction supervision for civil works as well as monitoring adherence to the E&S risk management instruments related to environmental and social and OHS matters.
- Oversee the performance on labour and working conditions on daily basis on behalf of the PIU, including identification of potential existing significant OHS or environmental risks due to the project that are not adequately mitigated.
- Submit weekly reports related to project ESHS performance.

8.5 World Bank Implementation Support

The World Bank:

- Provides guidance on the compliance with the World Bank's ESSs.
- Performs compliance monitoring of SURP II and the AFs to ensure that the relevant ESSs are complied with and conduct regular implementation support missions.
- Procures and engages the services of a TPM who provides quality assurance of the supervision carried out by the ESC and conduct spot checks on both the engineering quality of civil works and the implementation of the E&S instruments.
- Maintains an oversight role, review, and clear the project's ESMF, and environmental assessment instruments such as any ESIA or ESMPs/SEPs of subprojects.
- Conducts regular implementation support missions to check project E&S performance and assess the projects' compliance to agreed grant covenants.
- Recommends measures for improving the performance of the project PIUs and the PCU on E&S risk management.
- Supports appropriate training program intended to improve the capacity of PIUs as necessary. Key E&S issues that have been/will continue to be covered in capacity support under project include:

- a. the World Bank ESF in general.
- b. preparation of E&S instruments (ESMP/LMPs, RAPs, SEPs, and SMPs).
- c. labour and occupational and community health and safety issues (such as OHS measures in construction and traffic safety).
- d. GBV.
- e. resettlement.
- f. grievance redress.
- g. contractor management.
- h. monitoring and supervision.

8.6 Budget for Implementing the ESMF

An indicative budget of USD 856,090.40 has been reserved for the ESMF implementation, of which **Table 9** below provides the budget breakdown. The resources are meant to cover E&S related expenses such as capacity building programs, coordination, and public consultation meetings, planning workshops, monitoring work, and environmental consultancy services.

This estimated budget does not include the cost for mitigation and enhancement measures, which are integrated into the construction cost. All administrative costs for the operation of the PIU are included in the project cost.

Table 9: Indicative Budget for implementing the ESMF for SURP II and the AFs

ESMF Requirements	Budget Basis and Assumptions	Total Cost (USD)
Capacity Building for PIU Personnel and Municipalities	Training programs held in-country (all in one year)	62,000
Meetings, Workshops and Stakeholder Engagement	For 30 persons/year x two workshops	6,000
Environmental Screening of Transactions	No additional budget	No additional budget
Field Visits to Project Locations	Field visits estimated for two PIU personnel to cover transport and daily allowances. The PIU Environmental and Social Specialist attached to the municipalities is required to visit the sites once every week, accompanied by the Community Engagement Officer.	Already in PIU budget
Subproject Scoping Workshops	One-day ESIA/ESMP Scoping workshop for bridges and quarries	Budget as part of ESMP preparation (10,000)
Typical ESMP Report for Subprojects	Assumed average cost of each ESMP, 25 days	Budget as part of ESMP preparation (60,000)
Typical Stakeholder Engagement for Subprojects	Assume average cost of each ESMP, 10 days	Budget as part of ESMP preparation (15,000)
Engagement of Temporary Environmental and Social Assistants	Allow for five assistants, 10 days each plus expenses	Budget as part of ESMP preparation (85,000)
Monitoring Compliance with ESMP during Pre-Operations Activities	Assumed quarterly monitoring activities over five days, each quarter, per year (two persons plus logistics, per diem, etc.)	Budget as part of ESMP preparation (40,000)

Monitoring Compliance with ESMP and during Operations	Assumed quarterly monitoring activities over five days, each quarter, per year (one person plus logistics, per diem, etc.)	Budget as part of ESMP preparation (30,000)
Costs Associated with the PCU	Administrative expenses incurred by the central coordination unit for the project	120,000
Costs Incurred by the Municipalities Implementing the ESMF and Associated Instruments	Garowe (20,000), Beledweyne (36,768), Dhuusamareeb (25,496), Mogadishu (100,000), Kismayo (29,000), Baidoa (12,000) and Hargeisa (100,000)	350,264
TOTAL Estimated Budget		778,264.00
Includes 10% contingency		77826.40
		856,090.40

ANNEX 1: WORLD BANK ENVIRONMENTAL AND SOCIAL STANDARDS

ESS1: Assessment and Management of Environmental and Social Risks and Impacts^{*24}

This Standard sets out the Borrower's responsibilities for assessing, managing and monitoring environmental and social risks and impacts associated with each stage of a project supported by the Bank through Investment Project Financing (IPF), in order to achieve environmental and social outcomes consistent with the Environmental and Social Standards (ESSs).

ESS2: Labour and Working Conditions*

This Standard recognizes the importance of employment creation and income generation in the pursuit of poverty reduction and inclusive economic growth. Borrowers can promote sound worker-management relationships and enhance the development benefits of a project by treating workers in the project fairly and providing safe and healthy working conditions.

ESS3: Resource Efficiency and Pollution Prevention and Management*

This Standard recognizes that economic activity and urbanization often generate pollution to air, water, and land, and consume finite resources that may threaten people, ecosystem services and the environment at the local, regional, and global levels. This ESS sets out the requirements to address resource efficiency and pollution prevention and management throughout the project life-cycle.

ESS4: Community Health and Safety*

This Standard addresses the health, safety, and security risks and impacts on project-affected communities and the corresponding responsibility of Borrowers to avoid or minimize such risks and impacts, with particular attention to people who, because of their particular circumstances, may be vulnerable.

ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement*

Involuntary resettlement should be avoided. Where involuntary resettlement is unavoidable, it will be minimized and appropriate measures to mitigate adverse impacts on displaced persons (and on host communities receiving displaced persons) will be carefully planned and implemented.

ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources*

This Standard recognizes that protecting and conserving biodiversity and sustainably managing living natural resources are fundamental to sustainable development and it recognizes the importance of maintaining core ecological functions of habitats, including forests, and the biodiversity they support. ESS6 also addresses sustainable management of primary production and harvesting of living natural resources and recognizes the need to consider the livelihood of project-affected parties, including Indigenous Peoples, whose access to, or use of, biodiversity or living natural resources may be affected by a project.

²⁴ The asterisk sign (*) denotes that this Standard is applicable in SURP II and SURP II AFs.

ESS7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities

This Standard ensures that the development process fosters full respect for the human rights, dignity, aspirations, identity, culture, and natural resource-based livelihoods of Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities. ESS7 is also meant to avoid adverse impacts of projects on Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities, or when avoidance is not possible, to minimize, mitigate and/or compensate for such impacts.

ESS8: Cultural Heritage*

This Standard recognizes that cultural heritage provides continuity in tangible and intangible forms between the past, present and future. ESS8 sets out measures designed to protect cultural heritage throughout the project life cycle.

ESS9: Financial Intermediaries (FIs)

This Standard recognizes that strong domestic capital and financial markets and access to finance are important for economic development, growth and poverty reduction. FIs are required to monitor and manage the environmental and social risks and impacts of their portfolio and FI subprojects, and monitor portfolio risk, as appropriate to the nature of intermediated financing. The way in which the FI will manage its portfolio will take various forms, depending on a number of considerations, including the capacity of the FI and the nature and scope of the funding to be provided by the FI.

ESS10: Stakeholder Engagement and Information Disclosure*

This Standard recognizes the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation.

More information on the ESSs is available at:

<http://pubdocs.worldbank.org/en/837721522762050108/Environmental-and-Social-Framework.pdf#page=53&zoom=80>

ANNEX 2: SURP II ENVIRONMENTAL AND SOCIAL SCREENING CHECKLIST FOR SUBPROJECTS

SECTION A: General Sub-Project Information	
Date of screening	
Activity/Sub- project title	
Activity/Sub- project component	
Proposed activity duration	
ES Screening Team Leader and Contact Details	
ES Screening Team Member	
Name of Executing Agent	
Site/Activity location (include GPS coordinates)	
New/Rehabilitation project	
Objective of the screening process	<ul style="list-style-type: none"> i. To assess the suitability of the proposed site for----- -- ii. To determine the potential E&S risks and impacts and proposed mitigation measures for the proposed sub-project. ii. To determine the risk classification and E&S instrument to be prepared and implemented. v. Ensure the mitigation measures identified in the matrix are translated to detailed mitigation measures in the environmental and social management plans for the sub-project. v. Ensure the completed E&S screening outcome is integrated
E&S Framework and Overall Project Risk Classification	
Project Description. Briefly describe the project activities	

SECTION B: Potential Environmental/Social Risks Impacts of Activities

Risk Category <i>(Please check each line appropriately. At this stage, questions are answered without considering the magnitude of impact – only yes, no or I don't know are applicable answers)</i>	Yes	No	UN K	If these risks ('yes') are present, refer to:	Remarks
ESS 1: Assessment and Management of Environmental and Social Risks and Impacts					
Is an Environmental and/or Social Assessment required where the project is undertaken?				World Bank Environment and Social Standards	
Is there a risk of a lack of monitoring of project activities?				ESMP and C-ESMP	
Are there any plans for future land uses on or around the location which could be affected by the proposed project activities during the operational phase				ESMP	
Is there a risk that the activity will cause population influx from neighboring areas?				LMP	
Is there a risk that the selection of the activity location or beneficiaries will lead to conflict?				Stakeholder Engagement Plan (SEP) and Grievance Redress Mechanism (GRM) for the project	
ESS 2: Labour and Working Conditions					
Is the project likely to provide local employment opportunities, including employment opportunities for women?				Labour Management Procedures	
Does the activity include any of the known labour risks / ESS 2 non-compliance risks (child and forced labour)?				Labour Management Procedures (LMP); GRM	
Does the activity include a construction component?				LMP, C-ESMP Occupational Health and Safety Management Plan (OHSMP)	
Will the project potentially involve an influx of workers to the project location?				Occupational Health and Safety Plan (OHS) C-ESMP	
Is there a security risk for project Workers?				LMP	
Will there be any potential risk of OHS accidents during the construction, and				OHSMP: risks of OHS accidents	

Risk Category (Please check each line appropriately. At this stage, questions are answered without considering the magnitude of impact – only yes, no or I don't know are applicable answers)	Yes	No	UN K	If these risks ('yes') are present, refer to:	Remarks
operation phase of the project which could affect human health and the environment?				including but not limited slip and falls, confined spaces and struck by objects.	
Is there a risk of delayed payment of workers?				LMP, GRM implementation	
Is there a risk that workers are underpaid?				LMP implementation	
ESS 3: Resource Efficiency and Pollution Prevention Management					
Will the construction or operation of the project use natural resources such as land, water, sand, materials or energy, especially any resources which are non-renewable or in short supply?				C-ESMP; ESMMP	
Will the project involve use, storage, transport, handling or production of substances or materials that could be harmful to human health or the environment or raise concerns about actual or perceived risks to human health?				ESMF, GRM, OHSMP, SEP	
Will the activity result in the production of solid waste (directly by the project or by the workforce) during construction, operation, or decommissioning?				ESMP to address its management	
Will the activity result in the production of toxic or hazardous waste? (e.g. used oils, inflammable products, pesticides, solvents, pharmaceuticals, industrial chemicals, ozone depleting substances)					
Will the activity result in generation of dust and noise?				C-ESMP	
Will the activity result in soil erosion?				C-ESMP	
Will the activity produce effluents (waste water)?				C-ESMP	
Are there nearby portable water sources that need to be protected?				ESMP	
Will the activity result in siltation and/or contamination of the water body?				C-ESMP	
Will the activity result in increased levels of vibration from construction machinery?				C-ESMP	
Will the project release pollutants or any other hazardous, toxic, or noxious				C-ESMP OHSMP	

Risk Category (Please check each line appropriately. At this stage, questions are answered without considering the magnitude of impact – only yes, no or I don't know are applicable answers)	Yes	No	UN K	If these risks ('yes') are present, refer to:	Remarks
substance to the air? (e.g. significant greenhouse gas emissions, dust emissions)					
Will the activity disturb any fauna and flora?				C-ESMP	
Will the activity result in water with high Total Dissolved Solids (TDS) with more than 1,500 ppm?				C-ESMP Waste Management Plan	
Can the project affect the surface or groundwater in quantity or quality? (e.g., discharges, leaking, leaching, boreholes, etc.)				C-ESMP;	
Will the project require the use of chemicals? (e.g., fertilizers, pesticides, paints, etc.)				Operational ESMP, Emergency Response Plans	
Will the project produce effluents (wastewater)?				ESMP	
Is there any risk of accidental spill or leakage of material?				ESMP	
Is the proposed site well planned with clear access?					
Is the proposed site prone to flooding?					
What is the risk of fire?					
Will the proposed project affect natural water ways?					
Will the project increase the impermeable surface area through compaction of soil?					
Will the proposed project lead to an increase in sedimentation of water ways?					
ESS 4: Community Health and Safety					
Will the project interfere with the normal health and safety of the public?				ESMP, C-ESMP	
Are there any routes or facilities on or around the location which are used by the public for access to recreation or other facilities, which could be affected by the project?				GRM	
Is there a risk of communal drinking water pollution through hazardous waste?				ESMP, (OHSMMP and WMP)	
Is there a risk of increased GBV cases due to labour influx?				GRM, LMP	

Risk Category (Please check each line appropriately. At this stage, questions are answered without considering the magnitude of impact – only yes, no or I don't know are applicable answers)	Yes	No	UN K	If these risks ('yes') are present, refer to:	Remarks
Is there a risk of spreading communal diseases due to labour influx?				LMP, GRM, C-ESMP	
Is there a security risk for the community triggered by project activities?				LMP	
Will the project interfere with the normal health and safety of the worker, employee or public?				ESMP, OHSP	
Does the activity have the potential to upset community dynamics during the construction and operation phase?				SEP; GRM	
Will the activity expose community members to physical hazards on the project site?				C-ESMP; OHSMF	
Will the activity pose traffic and road safety concerns?				C-ESMP	
Is there a possibility that the activity contaminates open wells?				ESMP	
Is there a possibility that the activity spreads pathogens and other pollutants				Waste Management Plan	
ESS 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement					
Will the project lead to the displacement of a population? (e.g. forceful relocation, relocation of the local community)				ESMP, GRM, RPF	
Is the project located in a conflict area, or has the potential to cause social problems and exacerbate conflicts, for instance, related to land tenure and access to resources (e.g. a new road providing unequal access to disputed land)?				ESMP, GRM, RPF	
Is there a risk that the activity leads to loss of income, assets or means of livelihoods?				SEP, LMP, RPF	
Will the activity lead to disputes over land ownership?				ESMP, GRM, RPF	
Will the activity lead to blocked access to people in the area?				ESMP, GRM and RPF	
Will the activity require acquisition of land or physical buildings or infrastructure?				RPF	
ESS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources					
Will the project be located within, or near, environmentally sensitive areas or areas of high ecological value?				ESMF	
				ESMF	

Risk Category (Please check each line appropriately. At this stage, questions are answered without considering the magnitude of impact – only yes, no or I don't know are applicable answers)	Yes	No	UN K	If these risks ('yes') are present, refer to:	Remarks
Can the project cause disruption of wildlife migratory routes				ESMP	
Will the project affect fragile, protected, or endangered ecosystems or species? (e.g., natural forests, wetlands, estuarine, coral reefs, mangroves, endemic species, endangered species etc.).				ESMP	
Can the project impact ecosystems upon which communities rely for food, water, fibers, or other basic needs, including cultural and spiritual needs?				ESMP	
Are the needs of the project likely to exceed the capacity of existing water supply, sanitation systems, transport, or other infrastructure				ESMMP	
Will the project involve extraction, diversion or containment of surface or groundwater?				ESMP	
Will the activity impact sensitive areas?				ESMP	
Is there a risk that the activity will cause changes in land form and habitat, habitat fragmentation, blockage or migration routes, water consumption and contamination?				ESMP	
Is there a risk that the activity causes loss of precious ecological assets?				ESMP	
ESS 7: Indigenous Peoples/sub-saharan African Historically Underserved					
Are there communities that meet the requirements of ESS7?				ESMP	
Is there a risk for impact on the indigenous people				ESMP	
Will the project lead to gender disparity?				ESMP	
ESS 8: Cultural Heritage					
Will the project be located in or close to a site of natural or cultural value?				ESMF and ESMP	
Is the project site known to have the potential for the presence of cultural and natural heritage remains?					
ESS 10: Stakeholder Engagement and Information Disclosure					
Is there a risk that the activity fails to incorporate measures to allow meaningful, effective and informed				Stakeholder Engagement Plan (SEP)	

Risk Category (Please check each line appropriately. At this stage, questions are answered without considering the magnitude of impact – only yes, no or I don't know are applicable answers)	Yes	No	UNK	If these risks ('yes') are present, refer to:	Remarks
consultation of stakeholders, such as community engagement activities?					
Is there a historical exclusion of disabled persons in the area?				Stakeholder Engagement Plan (SEP)	
Is there a lack of community consultations by the government generally?				Stakeholder Engagement Plan (SEP)	
Are women likely to participate in decision-making processes in regard to the activity?				Stakeholder Engagement Plan (SEP)	
Is there a risk that exclusion of beneficiaries leads to grievances?				SEP; GRM	

SECTION C: SUMMARY OF THE E&S SCREENING PROCESS

E&S Screening	Results and Recommendation		
Screening Results: Summary of Critical Risks and Impacts Identified	Risk/Impact Environment Risks <ul style="list-style-type: none"> Social Risks <ul style="list-style-type: none"> 	Individual Risk/Impact Rating	Mitigation <ul style="list-style-type: none">
Is Additional Environmental and social Assessment Necessary?	E&S Screening Result/Out come		Summary of Screening Result Justification
Authorization			
	Approved by:		Signature..... Date.....
	Designation.....		

ANNEX 3: DRAFT TERMS OF REFERENCE FOR AN ESIA FOR SITE-SPECIFIC SUBPROJECT

1.0 INTRODUCTION

1.1 Purpose of the ESIA

There is need to carry out an Environmental and Social Impact Assessment (ESIA), which will have to comply with the environmental laws and procedures of the Government of Somalia and with the Environmental and Social Standard (ESS) 1 on Assessment and Management of Environmental and Social Risks and Impacts of the financing institution, the World Bank.

1.2 Objectives of the ESIA

The objectives of the ESIA are to:

- Thoroughly document baseline conditions of the study area and the socio-economic conditions of the affected communities.
- Place the ecological baseline conditions of the concession area in the context of the surrounding region.
- Inform, obtain and address contributions from stakeholders including relevant authorities and the public.
- Assess in detail, the environmental and social impact that would result from the subproject.
- Identify mitigation measures that would reduce the significance of predicted negative impacts or enhanced predicted benefits of the proposed subproject.
- Develop an appropriate environmental and social management plan (ESMP) for the proposed subproject; and
- Meet the requirements of the national environmental regulatory agencies in Somalia as well as the ESS1 of the World Bank, and other international good practice for subproject of this nature.

The ESIA will identify the potential environmental and social risks and impacts associated with the subproject and then provide the measures that will be required to manage those risks and impacts, which will be incorporated into an ESMP. A multi-disciplinary team of experts will conduct the ESIA with the stages identified as follows:

2.0 PHASE DESCRIPTION

Screening / Scoping - Identification of key issues and concern that are to be addressed by the specialist studies

Stakeholders Engagement - Initial engagement of key stakeholders during scoping

Baseline Study - Characterize current broadly-defined environmental and social conditions on and near the site to serve as a basis against which impacts can be measured and monitored

Assessment and Mitigation - Identification of positive and negative impacts; the potential spatial extent, severity, duration and probability of impacts are described along with mitigation actions

Reporting - Collation of specialist studies and assessments and the compilation of the ESIA Report

Review - The ESIA Report is reviewed by the Ministry, sector agencies and stakeholders. All stakeholders in the process should have an opportunity to comment on the ESIA Report, in such a manner that any concerns are able to be taken into account.

The ESIA process will be guided by the World Bank ESS1 and other international good practice guidelines for projects of this nature.

3.0 TASKS

The ESMP, based on the Environmental and Social Impact Assessment, shall identify those environmental and social (E&S) issues that require a more detailed management plan in order to manage potential impacts and mitigation. In the conduct of the ESIA, the consultant team will lean on the SURP II ESMF and undertake the following tasks:

- Provide a detailed description of the subproject.
- Describe alternatives examined in developing the subproject.
- Identify the relevant laws, guidelines, regulations and standards that define the operating framework of the subproject.
- Assemble relevant environmental baseline information on the municipality and the subproject area including but not limited to geology, soils, hydrology, surface water quality, noise, air quality, climate, terrestrial and aquatic flora and fauna.
- Assemble relevant social baseline information on the municipality and the subproject area including but not limited to roads, livelihoods, population data disaggregated by gender, poverty, gender and GBV, health, education, water and sanitation, solid waste, cultural heritage, vulnerable and disadvantaged groups.
- Identify and assess the physical, biological, socio-economic impacts of the subproject.
- Identify and assess cumulative impacts.
- Identify and discuss mitigation measures for identified impacts and clearly identify residual impacts.
- Conduct and document stakeholder engagement.
- Prepare an environmental and social management plan that recommends measures to address those adverse impacts that can be avoided or reduced to acceptable levels; and
- Design a monitoring and auditing plan for the duration of the subproject.

4.0 SPECIFIC ISSUES TO BE ADDRESSED BY THE ESIA

The consultant team will address the full range of issues triggered by the proposed subproject.

Specific issues include:

- A detailed description of the subproject area, including relevant environmental and social baseline information, maps showing the boundaries of the subproject area, layout of current land uses of the surrounding areas and network of drainage systems.
- Current water quality data from surrounding streams, rivers and groundwater and the establishment of fixed stations for continuous monitoring.
- Dust and noise management in particular from haul roads.
- Impacts to aquatic and terrestrial flora and fauna.
- Water use and effluent management.
- Waste management.
- Land use.
- Cultural and archaeological resources.
- Occupational health and safety.
- Social and economic impacts to the local communities including direct benefits such as jobs.
- Gender and management of GBV/SEA/SH risks.
- Inclusion and management of risks and impacts on to vulnerable and disadvantaged groups.
- Cumulative and residual impacts of the project.
- An ESMP.

- A Monitoring and Auditing Plan; and
- An Emergency Response Plan (to consider identification of emergencies, response mechanisms, personnel responsibilities and equipment and training requirements).

5.0 SITE VISIT AND SCOPING

The ESIA consultant will cover the cost of site visits associated with the conduct of the ESIA, public notices and other costs associated with the ESIA.

6.0 TECHNICAL TEAM

Team Members shall satisfy these minimum requirements:

General Professional Experience:

Mandatory (must have)

- Science degree in relevant subject areas
- At least six years of professional working experience (ten for team leader), of which three years must be related to ESIA in the sector, in the region
- Good communication skills, verbally and written
- Ability to work in a team (or lead a team, in the case of the team leader)
- Working knowledge of English (writing and speaking)

Desirable (nice to have)

- Knowledge of the country
- Knowledge of relevant local language (s)

Specific Professional Experience:

Mandatory

- Prior experience with World Bank policies and procedures
- Prior experience of EIA or ESIA, at least three previous assignments
- Prior experience of leading teams (for team leader) at least five previous assignments
- Prior experience of the specific sector, at least three previous assignments

Desirable (nice to have)

- Prior experience of ESIA in the sector in the country

7.0 ESIA REPORT

Outline for an Environmental and Social Impact Assessment Report:

An Environmental and Social Impact Assessment process is not a matter of preparing a report and obtaining approval only, as its purpose is to help ensure that the environmental and social concerns of local communities and other stakeholders are taken into account throughout the life of the subproject. The ESIA must be tailored to the specific subproject and to the legal requirements, environmental and social conditions where it is situated. The coverage of the ESIA report itself will depend on local circumstances. The identification and participation of relevant stakeholders is a critical part of the process. The following outline for a typical ESIA report is offered on the basis that identified issues will not necessarily have the same degree of relevance for all subprojects:

Executive Summary or Non-Technical Summary – To be written in non-technical language, be translated into the major indigenous language(s) and be accessible and understandable to the relevant stakeholders and/or affected communities.

Methods and Key Issues – This provides the opportunity to clarify some basic information about the ESIA including what difficulties have been encountered and the limitation of the assessment.

Legislative Framework – The legislative framework should include the relevant legislation and requirements of the country and region where the subproject is situated. It is also important to include a statement that commits the subproject to compliance.

Consultation Process – Contains the step-by-step approach and views expressed. If clear recommendations resulting from the consultation process were not followed, the reasons for those decisions are to be provided.

Description of the Environmental and Social Baseline – Describes relevant information collected in the municipality and the subproject area in order to provide a picture of existing trends resulting from natural events or human activities, the current state of the environment, the current socio-economic conditions in the subproject area, and any potential future changes which may occur as a result of planned developments.

Consideration of Alternatives – Presents the results of a well-thought-out process that has ensured that reasonable alternatives of different types have been considered.

Description of the Proposed Development – Covers the purpose and scope of the subproject, an overview of the subproject and its location, a detailed description and layout, the site preparation and construction, and the nature of the process, as well as resources and technologies to be used.

Prediction and Evaluation of Significant Environmental and Social Impacts – Emphasizes the most important impacts, who or what these will affect, and how significant the effect will be.

Mitigation/Offset Measures – Provides an assessment of the hierarchy of impacts and what mitigation measures are needed to alleviate the impacts and residual and/or cumulative effects. Includes the proposed methodology to reduce negative impacts.

Environmental and Social Management Plan – Provides a framework for managing and monitoring impacts (implementation costs inclusive) for the duration of the subproject and ensuring corrective measures. Must be designed to ensure that the commitments made in the ESIA, and in any subsequent assessment reports, together with any license approval or similar conditions are implemented.

Monitoring and Auditing Plan – The monitoring plan is primarily to ensure a subproject is implemented (pre-construction, construction and commissioning) with commitments made in the ESIA. The auditing plan is primarily to ensure a subproject is operated (after commissioning) in accordance with commitments made in the ESIA.

Bibliography – A list of all references cited must be included in the report.

8.0 THE TECHNICAL TEAM

One-page CVs of each technical team members is to be appended to the ESIA Report.

9.0 MANAGEMENT OF THE ESIA PROCESS

The consultant will manage the overall ESIA process and will be responsible for the compilation and presentation of the ESIA Report. The consultant will plan, coordinate, and execute all activities of the ESIA process as well as in the planning and execution of the public scoping meeting and public hearing if required. The consultant will provide updates to all relevant parties on the ESIA process.

10. DURATION

The duration for the preparation of ESIA will be adequate to describe the base line accurately, taking into account any potential seasonal changes.

11. ESIA SUBMISSION

This will be discussed with the commissioning authority.

ANNEX 4: DRAFT TERMS OF REFERENCE FOR AN ESMP FOR A SUBPROJECT

Introduction and Project Description:

Give a short description of the subproject.

Purpose

Indicate the objectives and the subproject activities, the activities that may cause environmental and social risks and negative impacts and need adequate mitigation measures.

Tasks

The ESMP shall cover:

- Relevant environmental and social baseline data on the municipality and the subproject area;
- Potential environmental and social impacts resulting from subproject activities;
- Proposed mitigation measures;
- Institutional responsibilities for implementation;
- Monitoring indicators;
- Institutional responsibilities for monitoring and implementation of mitigation measures;
- Costs of activities; and
- Calendar of implementation.

The ESMP results and the proposed mitigation measures shall be discussed with relevant stakeholders, NGOs, local administration and other organizations involved in the subproject activities. Recommendations from these public consultations shall be included in the final ESMP.

Format

- Cover page
- Table of Contents
- List of Abbreviations, Acronyms and Units
- Introduction
- Subproject description and relevant environmental and social baseline information on the municipality and the subproject area
- Applicable standards focused on the relevant World Bank Environmental and Social Standards (ESSs). Country Standards, other funding partner standards, other international standards, if appropriate (ISO, WMO, WHO and so on) and other elements of good international practice shall be reflected as pertinent. If there are specific international standards or practices that need to be met, these must be listed.
- Description of environmental and social impacts and mitigation measures for subproject activities
- Institutional framework, roles and responsibilities, action parties
- Monitoring indicators
- ESMP Training requirements, if any

Timescale

The consultant will produce the final ESMP one week after receiving consolidated comments from the World Bank and the participating institutions in Somalia.

Deliverables

Draft and Final ESMP (soft copy only)

ANNEX 5: SURP II AND FOURTH ADDITIONAL FINANCING GBV ACTION PLAN



UPDATED SEXUAL EXPLOITATION AND ABUSE/SEXUAL HARASSMENT PREVENTION AND RESPONSE ACTION PLAN

I. Introduction

The Somalia Urban Resilience Project, phase II, is an urban resilience and municipal governance project that targets the seven cities of Mogadishu (Benadir Regional Administration), Garowe (Puntland State), Kismayo (Jubaland State), Baidoa (South-West State), Dhuusamareeb (Galmudug State), and Beledweyne (Hirshabelle State).. The Project Development Objective (PDO) 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 was approved in December 2019, its implementation commenced in April 2020 and is expected to close on 31st December 2026. In its current form, the Project has benefitted from three Additional Financial Agreements with the first Additional Financing (AF1) Agreement signed on 23rd June 2022, the Second Additional Financing (AF2) Agreement signed on 6th January 2023, and the third Additional Financing (AF3) signed on 15th May 2024.

The project is seeking a fourth additional financing (AF4) to upscale project intervention in Hargeisa City (Somaliland) Specifically, the AF4 entails several key changes including the scale-up of: (i) Component 1 by adding US\$20 million for climate resilient urban infrastructure in the additional city of Hargeisa; (ii) Component 2 by adding US\$1 million for government-led analytical work to inform broader urban development and policy dialogue in Hargeisa and enhanced capacity building support; (iii) Component 3 by adding US\$4 million for the federal Project Coordination Unit (PCU), Ministry of Public Works Reconstruction and Housing (MoPWRH), to establish and develop a new municipal Project Implementation Unit (PIU) in Hargeisa and supervise project implementation. The results frameworks will be revised accordingly, and the closing dates of the project will be extended from December 31, 2026, to November 30, 2028. The project title will also change from “Somalia” to “Somali”, to acknowledge the inclusion of Somaliland as part of the fourth additional financing (AF4).

The immediate project beneficiaries will be the residents in close proximity to the prioritized urban infrastructure in the six cities including those affected by forced

displacement i.e. IDPs and returnees. In addition, community members, including IDPs and other vulnerable community members will also benefit from short-term income generation opportunities, resulting from the civil works. The Project will also directly benefit households that have relocated to the cities of Mogadishu, Baidoa, and Garowe due to severe droughts in the country. New IDPs will be provided with support in health services, water sanitation and hygiene (WASH), housing land and property (HLP), and livelihood support. Municipal, State, and Federal Governments will benefit from institutional strengthening through managing implementation and capacity building initiatives.

The Project is directed by a Steering Committee chaired by the Federal Ministry of Public Works Reconstruction and Housing (MPWR&H) with representation of the Office of the Prime Minister (OPM), Ministry of Finance (MOF), Ministry of Planning, Investment and Economic Development (MOPIED) and representatives of participating FMSs. SURP II and its Additional Financing is coordinated by the Project Coordination Unit (PCU) established within the MPWR&H and is implemented by municipal-level Project Implementation Units (PIU) in Mogadishu, Baidoa, Garowe, Kismayo, Beledweyne, Dhuusamareeb and Hargeisa municipalities, with further coordination support from state-level inter-ministerial committees.

This action plan details the necessary operational measures and protocols that will be put in place to address sexual exploitation and abuse (SEA) and sexual harassment (SH). It also provides a guideline on resolving any SEA/SH allegations that may arise. In addition, procedures for preventing and responding to SEA/SH, how complaints of SEA/SH will be handled (investigation procedures), and disciplinary action for violation of the CoC by workers.

This project SEA/SH risks mitigation plan will put in place robust measures to address the risk of SEA/SH and how the project will address any GBV, SEA/SH incidents that may arise in the project and adjoining communities. The purpose of the action plan is to outline the prevention, mitigation and response measures that will be taken specifically SEA/SH. This plan is intended for and applicable to all Project workers as defined in the Labour Management Procedure (i.e. people employed or engaged directly by the Borrower to work specifically in relation to the project (direct workers); people employed or engaged through third parties to perform work related to core functions of the project, regardless of location (contracted workers); people employed or engaged by the Borrower's primary suppliers (primary supply workers); and people employed or engaged in providing community labour (community workers). In addition, this plan is also intended for and applicable to adjoining communities throughout the project cycle.

II. Definition of Terms

The Inter-Agency Standing Committee (IASC) defines **gender-based violence** (GBV) as “an umbrella term for any harmful act that is perpetrated against a person's will, and that is based on socially ascribed (gender) differences between males and females. GBV

broadly encompasses physical, sexual, economic, psychological/emotional abuse/violence including threats and coercion, and harmful practices occurring between individuals, within families and in the community at large. These include sexual violence, domestic or intimate partner violence, trafficking, forced and/or early marriage, and other traditional practices that cause harm.

The United Nations defines “**sexual exploitation**” as any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another.

Sexual abuse on the other hand is “the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.” Sexual exploitation and abuse (SEA) are therefore a form of gender-based violence and generally refers to acts perpetrated against beneficiaries of a project by staff, contractors, consultants, workers and Partners.

Sexual harassment (SH) is defined as any unwelcome sexual advance, request for sexual favor, verbal or physical conduct or gesture of a sexual nature, or any other behavior of a sexual nature that might reasonably be expected or be perceived to cause offense or humiliation to another, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment. It occurs between personnel/staff and involves any unwelcome sexual advance or unwanted verbal or physical conduct of a sexual nature.

III. OBJECTIVES OF THE GBV, SEA/SH RISK ASSESSMENT OF THE PROJECT

“Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) are manifestations of gender- based violence (or GBV). There are four broad categories of gender-based violence that can be exacerbated by World Bank investment project financing operations involving major civil works. (...) sexual exploitation and abuse and sexual harassment in the workplace are the types of gender- based violence that are most likely to occur in, or be exacerbated by, IPF operations”.

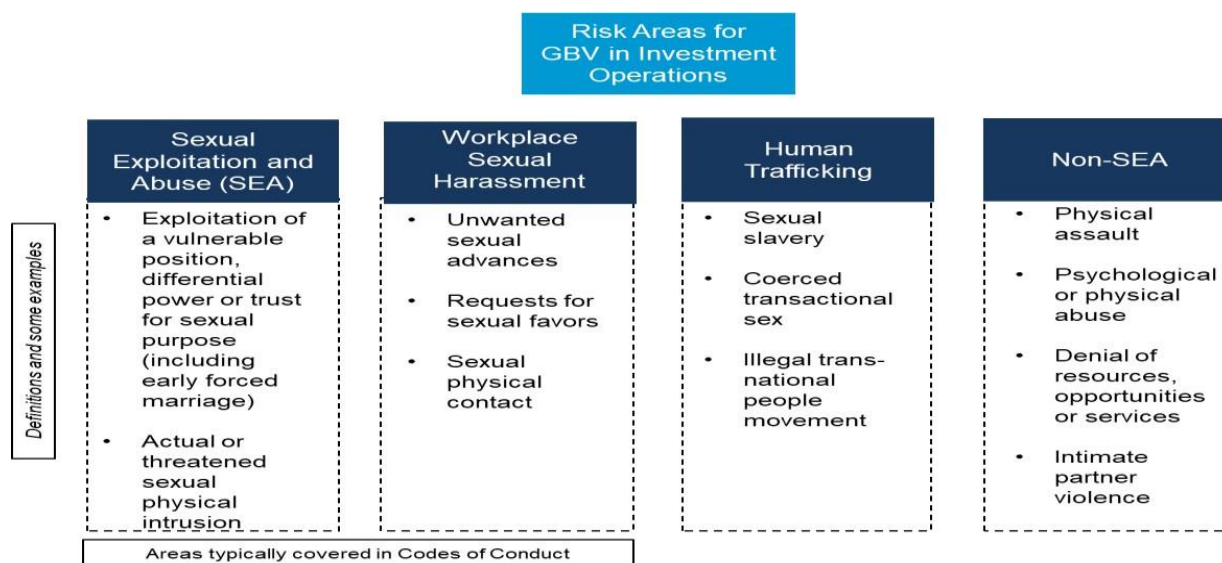


Figure 1: Types of GBV Likely To Be Exacerbated By IPF Operations Involving Major Civil Works

On the one hand, it is necessary to assess the risks of GBV and more specifically of SEA and SH that the activities of the project could present, to define and implement mitigation measures aimed at mitigating these risks. The overall objective of this risk assessment is to analyze the extent to which project components and activities are likely to generate or exacerbate certain forms of GBV, including SEA and SH. On the other hand, the assessment should consider the assessment of national and local capacities to prevent and respond to GBV, SEA and SH, including through the provision of safe and ethical services to survivors. GBV, SEA and SH.

The specific objectives of the risk evaluation include:

- Identification and analysis of the risks of aggravation of GBV within the framework of the project.
- Review of local capacities to prevent and respond to GBV in areas where project activities are implemented.
- Review of the coordination mechanisms of service providers to GBV survivors in the areas of implementation of project activities.

IV. CONTEXTUAL GBV RISKS

GBV²⁵ is globally one of the most prevalent violations of human rights and a public health problem of epidemic proportions. GBV affects men, women, and children, but it disproportionately affects women and girls and exists in every country and environment.

Violence is woven into the fabric of women and children's everyday lives and takes place primarily in the home, but also the workplace, in schools, on the streets, and in public spaces, and occurs irrespective of whether the country is undergoing conflict, crisis or is at peace, although the former can exacerbate violence.

Sexual violence, along with other forms of violence, is said to have become normalized in Somalia. This apparent normalization appears to be the result of sustained exposure to elevated levels of sexual violence over past decades compounded by the lack of national and community-level communication, discussion, and dialogue about sexual violence and other forms of GBV.²⁶

According to Somali Health and Demographic survey 2020 show that over 60% of women considered physical abuse, denial of education, forced marriage, rape and sexual harassment, forms of domestic violence²⁷. In addition, 95% of survivors that reports in 2020 were women, adolescent girls and children while 75% were from displaced communities, with different types of GBV include rape, gang rapes, sexual assault, physical assault, forced marriage, denial of resources, opportunities or services, and psychological/emotional abuse²⁸.

The GBV Area of Responsibility (AoR) in Somalia has 36 organizations in 35 locations in Somalia that are provided complete specialize services see [here](#) GBV referral dashboard.

GBV and SEAH are critical issues in Somalia. The country has faced decades of conflict, instability, and weak governance, contributing to a high prevalence of GBV and SEAH.

Capture below are policy and legal framework addressing these issues in Somalia.

- **National Gender Policy (NGP):** The National Gender Policy aims to promote gender equality and address gender-based violence in Somalia. It includes strategies to protect and empower women and girls, prevent GBV, and provide support services for survivors.
- **National Action Plan to End Sexual Violence in Conflict (NAP):** This plan focuses on addressing sexual violence in conflict situations, which is prevalent in Somalia due

²⁵ GBV includes a range of violations, including i) intimate partner violence; ii) non-partner sexual abuse; iii) harmful practices; iv) human trafficking and v) child sexual abuse. It is expected that the country and regional integration profiles will highlight the most prevalent forms of GBV within each country and provide considerations for how to address these risks most effectively.

<http://www.worldbank.org/content/dam/Worldbank/document/Gender/Arango%20et%20al%202014.%20Interventions%20to%20Prevent%20or%20Reduce%20VAWG%20-%20A%20Systematic%20Review%20of%20Reviews.pdf>

²⁶ International Alert/CISP (2015)

²⁷ Somali Health and Demographic survey (2020)

²⁸ Overview of Gender-based violence in Somalia 2021

to ongoing conflict and instability. It includes measures for prevention, response, and accountability.

- **Human Rights Roadmap:** Somalia's Human Rights Roadmap outlines the government's commitment to improving human rights, including the protection of women and children from violence and abuse.
- **Provisional Constitution of Somalia (2012):** The Provisional Constitution includes provisions for the protection of women and children from violence and discrimination. Article 15 guarantees the right to security and protection from violence.
- **Sexual Offences Bill:** This bill aims to provide comprehensive legislation to address sexual offenses in Somalia. It includes definitions of various sexual offenses, provisions for the protection of survivors, and penalties for perpetrators. However, its implementation has faced challenges due to political and social factors.
- **Child Rights Act:** The Child Rights Act includes provisions for protecting children from abuse, exploitation, and violence. It aligns with international conventions such as the UN Convention on the Rights of the Child (CRC).
- **Penal Code:** Somalia's Penal Code criminalizes various forms of violence, including rape and sexual assault. However, the code is outdated and does not comprehensively address all forms of GBV and SEAH.

One of the main challenges in addressing GBV and SEAH in Somalia is the weak implementation and enforcement of existing laws and policies. This is due to factors such as limited resources, lack of political will, and the influence of traditional norms.

V. SEA/SH PROJECT RISK LEVEL

Preventing and mitigating SEA/SH risks are essential protection and development imperatives. GBV exists in all contexts in which the World Bank operates and can be exacerbated by Bank engagements, with profound implications for the safety, dignity and well-being of affected communities. The overall GBV/SEAH risk rating for the project has been established as **Substantial**. Among other data sources this rating is also grounded on qualitative analysis on review of project documents. The assessment highlighted direct and indirect risks related to the activities planned by the project.

SURP II project has implemented various measures to address SEAH in civil works activities which is crucial and a requirement to ensure safety for all workers and involved communities residing in the project areas. Listed below are the key measures under implementation:

1) Strong GBV/SEAH Plan and Codes of Conduct

- **Developed GBV Action Plan:** Prepared comprehensive SEAH action plan for the project. To mitigate any SEA/SH-related risks and impacts of project activities, a SEA/SH Action Plan has been prepared under ESMF, ESMP and C-ESMP. The plan contains a tailored channel to handle SEA/SH grievances and proposes prevention mechanisms. It will be strictly followed by all project implementers.

- **Code of Conduct:** Integrated SEAH clauses into the contractor's and other implementers' code of conduct, clearly stating unacceptable behaviors and the consequences of such actions. All project workers, Security, contractors' workers including onsite workers and community volunteers works under project signed code of conduct and provided orientation before work started. There is a theme applied to all project site which (No code conducts no work'

2) Training and Awareness

- **Regular Trainings:** Conducted regular training sessions on SEAH for all staff, including Contractor's workers, Contract's management, Consultants, implementing partners, supervision team and community, to raise awareness and understanding of the SEAH prevention and response mechanisms.
- **Cultural Sensitivity:** Ensured training includes cultural sensitivity to address specifically non-Somali staff and to ensure diverse work environments that free from violence.
- **Regular awareness:** Regular tool box talk awareness provided to contractors workers and Security workers under the project on daily and Weekly basis.

3) Accountability, Reporting Mechanisms and Support Systems

- **Accountability response mechanisms:** developed accountability framework details how allegations of SEA/SH will be handled, procedures to report SEA/SH allegations internally, a referral pathway to refer aggrieved to appropriate service providers, and procedures of confidential requirements dealing with the cases.
 - **Survivors Support:** Mapped All GBV service providers that provides comprehensive support systems for survivor, including psychological counseling, medical care, Safety/Shelter and legal assistance.
 - **Safe Reporting Channels:** Establish safe Sensitive channel, confidential, and accessible reporting channels for survivor of SEAH, include SEAH trained focal points at PIU, contractors and Community. Toll free numbers and nearest GBV services contract published in construction and community sites.
 - **Project Standards:** Work towards setting and adhering to Project wide standards for SEAH prevention.
 - **Incident Response, Immediate Action:** Respond swiftly and effectively to SEAH incidents, ensuring immediate support for survivors and appropriate disciplinary action for offenders. There were no incidents of GBV reported under SURP II project, most likely due to sufficient awareness raising. However, under SURP II awareness raising activities including distribution of Information, Education, and Communication (IEC) materials to nearby villages and districts were carried out and this yielded some fruits in terms of awareness. Under SURP II AF2 non-project GBV cases from neighboring villages in Garowe were reported to the PCU GBV Specialist and shared with Bank. Survivors were referred to GBV service providers as per the Project GBV Accountability and Response Framework. Thus far, owing probably to a
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fear of reprisals, no SEA/SH incidents connected to the project have been reported. Along with stepping up case identification, SURP II project will keep strengthening awareness among all project stakeholders in all six municipalities.

- **Transparency:** Maintain transparency in handling SEAH cases while respecting the confidentiality and dignity of all parties involved.

4) Community Engagement

- **Community Awareness:** Engaged local communities to raise awareness about SEAH and the contractor's commitment to preventing it. The Community volunteers (GRCs members) provide awareness to the community resident in the construct site.
- **Participatory Approaches:** Involved community members in developing and implementing SEAH prevention measures to ensure they are culturally appropriate and effective.

5) Monitoring and Evaluation

- **Regular Audits and Monitoring:** Conducted regular monitoring to assess the effectiveness of SEAH implementation on the prevention, mitigation, response and practices. Through developed different tool in order to identify gaps in efforts to address SEAH such as ESF Instrument of SEAH Checklists and Observation check list for female workers in construction sites.
- **Feedback Mechanisms:** Implemented feedback mechanisms to continuously improve SEAH based on lessons learned and community input.

6) Project Leadership Commitment

- **Top-Down Commitment:** Ensured top management of Project teams and Contractors demonstrated a strong commitment to addressing SEAH, setting a tone of zero tolerance from the highest level of the project stakeholders.
- **Role Models:** Encouraged Manager and Specialists to act as role models in promoting a safe and respectful working environment.

7) Compliance

- **Adherence to ESF Standard:** Ensured full compliance with local, national, international laws and Project related to SEAH obligations.
- **Contractual Obligations:** Included SEAH prevention clauses in contracts with subcontractors and suppliers to ensure a unified approach according to the World bank procurement regulation.

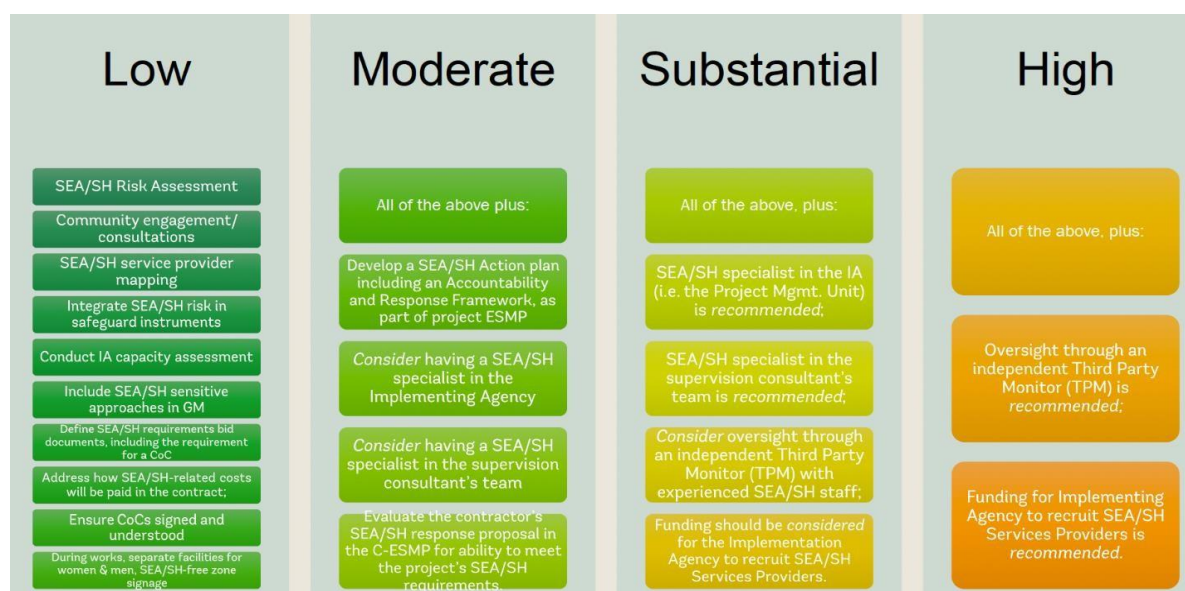
i. Risk Mitigation Measures

This GBV Action Plan outlines key measures for GBV prevention, mitigation and response that the Project will undertake to address. The potential GBV risks to women and children (particularly adolescent girls) living in adjoining communities who are a potentially vulnerable group for GBV and SEA as a result of the influx of workers may pose a threat to

the project. Workers at construction sites especially females at the construction site could also be vulnerable to sexual harassment and sexual exploitation and abuse. Project staff are also no exception to the issues at hand. This is the major reason why efforts will be made from all fronts to ensure zero tolerance for GBV during implementation.

The project will put in place robust measures to address the risk of Gender-Based Violence and any GBV/SEA/SH incidents that may arise during the project.

This effort also extends to persons living in adjoining communities. This plan is intended for and applicable to all project implementing agencies, contractors and sub-contractors; PIUs and PCU under Municipalities and Ministry Public Works respectively and adjoining communities throughout the project cycle. The project presents a substantial risk, the measures provided in the below diagram are designed to mitigate risks:



To properly manage the SEA and SH risks essential in the project activities, it is necessary to put in place actions to mitigate these risks. The action plan precisely details the risk mitigation measures and the budget for their operationalization.

During the identification and evaluation phase, the actions to mitigate the risks of SEA and SH are as follows:

- a) Ensure that the project's Gender/GBV Specialist provides technical and continuous support for the implementation and monitoring of the SEA/SH action plan, in coordination with the Community Engagement Specialists and Environmental and Social Specialists of the project.
- b) Provide an induction to project teams (PIUs, PCU, implementing partners, Contractors, Supervision team and etc.) on the World Bank's environmental and social framework and more specifically on the “Good Practice Note on Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in the Financing of Investment Projects Involving Major Civil Works” (Third Edition – October 2022).

- c) Ensure that the PIU is staffed with specialized and trained staff to carry out GBV prevention, coordination and monitoring activities. Ensure that a national consultant for Gender/GBV is recruited upstream of the project, preferably before the start of activities.
 - d) Ensure that the PIU receives regular technical assistance, in coordination with the GBV and environmental and social specialists of the World Bank, enabling it to continuously assess, throughout the project implementation cycle, the risks of GBV, SEA/SH of the project as well as the proper implementation of the action plan including measures to mitigate these risks.
 - e) Identify **through a mapping exercise** the GBV service providers which have the capacity to deliver quality survivor-centered services, including for GBV case management, victim advocacy and providing recommendations for the link with other services not provided by the organization itself.
 - f) Ensure that **the code of conduct**, including unacceptable behaviors and consequences of violations that explicitly address SEA and SH, are understood, and discussed by PIUs, PCU personnel, contractors, and workers or consultants employed by them, as well as by communities adjacent to the project areas.
 - g) Set out in detail in the Accountability and Response Framework how **SEA/SH allegations will be handled** (investigation procedures) and what disciplinary action will be taken if workers breach the Code of Conduct. The accountability and response framework should indicate at a minimum:
 - How allegations will be channeled, dealt with within what time frame, as well as the range of possible disciplinary measures for breaches of the code of conduct by workers, considering due process.
 - Internal procedures for reporting suspected SEA/SH incidents to establish accountability.
 - A safe and confidential referral mechanism for survivors to appropriate support services, anchored in the GBV national Standard Operating Procedures (SOP) and referral pathways; and
 - Procedures clearly setting out the confidentiality clauses to be respected in the management of cases.
 - h) Ensure that the **project's Grievance Mechanism (GM)** has gender-sensitive mechanisms for GBV, SEA and SH complaints/cases (i.e., equipped with the capacity to document GBV, SEA/SH cases) and a social communication plan (IEC). Arrangements for informing employees and the local community on how to report cases of SEA and SH as well as breaches of the code of conduct.
 - i) Ensure **active monitoring of the project areas through a mechanism for monitoring compliance with the standards and measures provided**. A monitoring framework must be completed and implemented by the Environmental and Social
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Monitoring Specialist as well as Project M/E Specialist and Supervision team safeguard specialist.

- j) In the areas targeted by the project activities and provide information to the community including community leaders, and Municipalities on women's rights, on the SEA/SH risk mitigation measures, including how, and where to report alleged cases (GM), and linkages with referral pathways to safely and confidentially access timely GBV services.
- k) As part of project **stakeholder consultations**, duly inform project affected people of SEA/SH risks and project activities to solicit their feedback on project design and environmental and social issues. Consultations should be carried out with a variety of stakeholders (political, cultural, religious, traditional elders, government authorities, local administrations, women's organizations, and youth, etc.), at the beginning and throughout the implementation of the project work.
- l) Ensure that women and girls and organizations that support women, girls and children participate meaningfully throughout the project cycle and that SEA and SH issues are covered in Stakeholder Engagement Plan (SEP) which will be implemented throughout the project to keep local populations and other stakeholders informed of the activities carried out.
- m) Arrange for a **third-party monitoring body or independent verifier** with staff experienced in gender-based violence to monitor implementation of the action plan for preventing and responding to sexual exploitation and abuse and sexual harassment and ensuring that all parties fulfill their responsibilities.
- n) Ensure **funds are available** to enable the Implementing Agency to recruit as appropriately and based on the results of the mapping of service providers, GBV service providers to facilitate access for survivors to safe, timely and confidential services (including to cover the costs of transport, documentation, and accommodation if necessary).

As part of the procurement, the following actions must be planned:

- 1) Clearly define SEA/SH requirements and expectations in tender documents.
 - 2) Consider adopting SPD requirements through different Bidding approaches for SEA/SH in procurements process.
 - 3) Clearly indicate in procurement documents how reasonably costs associated with SEA/SH issues will be covered in the contract. For example, one can include: i) in the terms of reference, specific line items for clearly defined SEA/SH activities (such as the preparation of relevant plans) or ii) specific provisional amounts for activities that cannot be pre- determined (such as implementation of relevant plan).
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- 4) Define and clearly explain the provisions of the code of conduct to bidders before submitting their bids.
- 5) Assess the framework for accountability and response to SEA/SH issues in the C-ESMP and confirm, before finalizing the contract, the contractor's ability to meet the project's prevention and response requirements against SEA/SH.

During the implementation of the project, the following actions must be planned:

- a) Review the C-ESMP to verify that it includes appropriate mitigation measures.
- b) Check how the complaints mechanism receives and handles complaints to ensure protocols are diligently followed and complaints are directed to an established mechanism to review and adjudicate SEA/SH complaints.
 - Ensure codes of conduct are signed and understood.
 - Ensure that those who sign codes of conduct fully understand their provisions.
 - Ensure that the codes of conduct have been signed by all those who will be physically present on the project site.
 - Train project staff in the behaviors required under codes of conduct.
 - Disseminate the codes of conduct (including visual illustrations, and appropriate languages) and discuss them with employees and local community.
 - Establish an accountability and response framework.
- c) Ensure that project personnel and workers and the local community have been trained in SEA/SH issues.
- d) Regularly monitor and evaluate progress in SEA/SH prevention and response activities, including reassessment of risks, as appropriate.

VI. ENVIRONMENTAL SOCIAL STANDARDS THAT TRIGGER GBV INCIDENCES IN THE PROJECT

ESS2 Labour and Working Conditions: This recognizes the importance of employment creation and income generation in the pursuit of poverty reduction and inclusive economic growth. As mitigation, a worker Grievance Redress Mechanism that is sensitive to GBV/SEA/SH issues, will be established and operated through a grievance hotline and assignment of focal points to address these grievances at all levels of the GM structure. A GBV Code of Conduct (CoC) is developed and will be signed by all project related workers. The CoC will be associated with the GBV/SEA/SH Prevention and Response Action Plan, which includes an Accountability and Response Framework. The CoC will include provision

for addressing SEA/SH and prohibitions against sexual activity with anyone under the age of 18.

ESS4 Community Health and Safety: Addresses the health, safety, and security risks and impacts on project-affected communities and the corresponding responsibility of government to avoid or minimize such risks and impacts, with particular attention to people who, because of their particular circumstances, may be vulnerable. Some project activities may give rise to risks, therefore, ensure the avoidance of any form of Sexual Exploitation and Abuse by relying on the WHO Code of Ethics and Professional conduct for all workers in the Project related facilities as well as the provision of gender-sensitive infrastructure such as segregated toilets and enough lighting.

ESS10 Stakeholder Engagement and Information Disclosure: Recognizes the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation. The consultations will provide information on project-related risks, including GBV/SEA/SH, and the proposed reporting and response measures, with a particular focus on women, children, and other vulnerable groups. GBV/SEA/SH consultations will be focused on understanding women and girls' experience, their wellbeing, health, and safety concerns, as they relate to project activities. A project-wide grievance mechanism (GM), sensitive to GBV/SEA/SH issues, and proportionate to the potential risks and impacts of the project will be established.

ESS5 land acquisition and resettlement: the need to anticipate and address risks for SEA and SH as part of the RAP Preparation and implementation is very crucial, for the reason that resettlement processes can exacerbate risks for GBV at the community level. The project team has a responsibility to ensure that it anticipates and mitigates the risk for induced effects of compensation and resettlement. This includes protecting women and girls from exposure to GBV as a result of displacement, compensation and/or resettlement, and ensuring that livelihoods interventions target issues of gender inequality that drive GBV. The project should adopt the checklist that supports to mitigate SEA/SH and Community-Level through the Resettlement Plan Cycle. See Annex II and Annex III.

VII. GBV/SEAH MITIGATION AND RESPONSE ACTION PLAN

Objective: To enhance response systems and mechanisms for prevention of and protection from all forms of GBV/SEAH

Outputs	Activity to Address SEA/SH risk	Steps to be taken	Timelines	Location	Responsible	Monitoring (Who will monitor)	Output indicators	Estimated Budget (USD)	Implementation Status
Define and reinforce GBV/SEAH requirements in procurement processes and contracts	1. Incorporate GBV/SEA/SH Requirements and expectations in the contractor and consultants' contracts.	<ul style="list-style-type: none"> Ensure that GBV/SEAH issues are incorporated in all contracts, evaluated as part of the bidding process, and signed by contractors and consultants working with contractors and suppliers to address GBV/SEAH through procurement processes, contract selection and negotiation and regular engagement along the supply chain. 	<p>During preparation of bid and Contract documents</p> <p>Continue during project Implementation</p>	All PIUs	<p>PCU Gender/GBV Specialist</p> <p>PIU Community engagement Specialists/ESS</p> <p>PCU/PIU Procurement specialist</p>	<p>PCU Program Coordinator</p> <p>PCU/PIU M/E Specialists</p>	<p>SEA/SH requirement and expectation are adapted in bid document.</p> <p>Bidding documents are reviewed and confirmed potential risks of SEA/SH are adequately addressed.</p> <p>Develop list of mandatory SEA/GBV procurement requirements for contractors in Projects and shared to Procurement teams.</p>	N/A	Ongoing

	1.2. Allocation of funds for GBV/SEAH related costs in procurement documents.	<ul style="list-style-type: none"> Clearly define SEA/SH requirements and expectations in the bidding documents; ensure evaluation of SEA/SH criteria as part of review of bidding documents. 	<p>During preparation of bid and Contract documents</p> <p>Continue during project Implementation</p>	All PIUs	<p>PCU Gender/GBV Specialist</p> <p>PIU Community engagement officers/ESS</p> <p>PCU/PIU Procurement specialist</p>	<p>PCU Program Coordinator</p> <p>PCU M/E Specialist</p>	<p>Bid documents with clearly defined SEA/SH incorporated in the bidding documents.</p> <p>Contract documents with clearly defined SEA/SH and Inclusivity of vulnerable people clauses/requirements.</p> <p>Ensure as standard practice in contractor Codes of Conduct for workers, prohibition of all forms of SEA/GBV, including language on prohibition against sexual activities</p>	N/A	Ongoing
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							with anyone under the age of 18. Numbers of Contractors and workers trained in prevention of GBV/SEAH		
2. Review the IA's capacity to prevent and respond to GBV/SEA	2.1. Recruit GBV Advisor with GBV/SEAH specific skills to support implementation and supervision of GBV/SEAH risk management requirements	<ul style="list-style-type: none"> Recruit Gender/GBV specialist with GBV/SEAH skills 	Quarter 4 Of September 2021	All PIUs	PCU	WB	Gender/GB V specialist is hired and in place.	N/A	Completed
	2.2. Codes of Conduct signed and understood.	<ul style="list-style-type: none"> Define the requirements to be included in the CoC which addresses GBV/SEAH Review CoC for provisions/clauses that guard against GBV/SEAH Signed CoCs by all those with a physical presence at the project site. 	<p>During Project implementation</p> <p>During Project implementation</p>	All PIUs	<p>PCU Gender/GB V Specialist/ ESS</p> <p>PIU Community engagement officers/ESS</p>	<p>PCU Program Coordinator</p> <p>PCU M/E Specialist</p> <p>WB/TPM</p>	<p>Code of conduct reviewed and ensured the GBV/SEAH , Child protection Environmental and social issues included.</p> <p>Percentage of workers that have signed a</p>	N/A	

		<ul style="list-style-type: none"> Train project-related staff on the behavior obligations under the CoCs. 					<p>CoC and understood.</p> <p>Percentage of workers that have attended CoC training.</p> <p>The number of Contactors and their workers understood and signed code of conduct.</p>		
	<p>2.3. Conduct GBV/SEAH Capacity Building training for all workers. (Project staff), Community, contractors, and consultants</p>	<ul style="list-style-type: none"> Develop a training plan Develop training materials Conduct training on GBV/SEA risks, responsibilities, and legal/policy requirements Conduct training for project staffs Develop reporting and accountability protocol for managing reported cases. 	Retraining during Project implementation.	All PIUs	<p>PCU Gender/GB V Specialist/ ESS</p> <p>PIU Community engagement officers/ESS</p>	<p>PCU Program Coordinator</p> <p>PCU M/E Specialist</p> <p>WB/TPM</p>	<p>Training plans and materials developed.</p> <p>Number of trainings conducted.</p> <p>Number of workers who have attended GBV/SEAH Trainings.</p>	150,000	Training Materials and report and accountability developed

	<p>2.4. Develop and establish/review GBV/SEA response and accountability framework to include Allegation Procedures to report SEA/GBV incidents and internally for case accountability procedures which should lay out confidentiality requirements for dealing with cases.</p>	<ul style="list-style-type: none"> Develop/review SEA/GBV Allegation Procedures to report SEA/SH issues. Inform employees and the community on how to report cases of SEA/SH, CoC breaches to the GM, and how such cases are handled. Develop accountability processes to address allegations of SEA/SH; disciplinary action for violation of the CoC by workers. 	<p>During Project duration</p> <p>Maintained throughout Project implementation.</p>	All PIUs	<p>PCU Gender/GBV Specialist/ESS</p> <p>PIU Community engagement officers/ESS</p>	<p>PCU Program Coordinator</p> <p>PCU M/E Specialist</p> <p>WB/TPM</p>	<p>An established and functional accountability framework.</p> <p>The accountability framework for Reporting GBV/SEAH developed.</p> <p>Referral and Standard Reporting procedure for GBV/SEAH developed.</p>	N/A	Completed
	<p>2.5. Conduct GBV/SEAH risk assessment in all SURP II project sites</p>	<ul style="list-style-type: none"> Develop/adaptation of safety audit tools Conduct periodic safety audits Include safety audit recommendations in project subcomponents. Assess GBV risks in the Civil work 	<p>Maintained throughout Project implementation.</p>	All PIUs	<p>PCU Gender/GBV Specialist/ESS</p> <p>PIU Community engagement Specialist/ESS</p>	<p>PCU Program Coordinator</p> <p>PCU M/E Specialist</p> <p>WB/TPM</p>	<p>Assessment Report</p> <p>Mitigation Plan</p>	N/A	Checklists were developed and adopted

		<p>context of project site.</p> <ul style="list-style-type: none"> • Ensure a safer environment for women and girls, to engage communities in the existing prevention and response. • Development risk mitigation plan based on the findings. 							
3. Map out GBV/SEA prevention and response service providers	<p>3.1.</p> <p>GBV Service Provider Mapping and Development of a Referral Pathway</p>	<ul style="list-style-type: none"> • Update annually List GBV service providers in the project site. • Develop tools for assessing capacity of GBV/SEA service providers. • Conduct a deeper quality assessment of service providers such as success rate, the response of Service Providers, time is taken to resolve, reputation within the community and State administrations. 	Maintained throughout Project implementation for the update of service providers	All PIUs	<p>PCU Gender/GBV Specialist/ESS</p> <p>PIU Community engagement Specialist/ESS</p>	<p>PCU Program Coordinator</p> <p>PCU M/E Specialist</p> <p>WB</p>	<p>updated GBV service provider in All PIUs</p> <p>Capacity Assessment tool developed</p> <p>Disseminated List of GBV service Delivery Organizations</p>		Updated GBV service providers annually and Capacity assessment tool prepared

	3.2. Organize Stakeholder consultations	<ul style="list-style-type: none"> Develop interview/facilitation guides. Organize community sensitization meeting to inform on the components of the projects and project risks related to GBV/SEAH and referral pathways on where to seek confidential services. 	Prior and during of civil work started	All PIUs	PIU Community engagement officers/ESS PCU Gender/GBV Specialist/ESS	PCU Program Coordinator PCU M/E Specialist WB	Number of stakeholder consultations done	250,000	Ongoing
	3.3. Develop and or/update a multisectoral GBV/SEAH help-seeking referral pathway(s)	<ul style="list-style-type: none"> Based on mapped GBV prevention and response service providers develop/update a GBV referral list for service providers. Develop referral protocols that outline key requirements for reporting cases if they arise and measures for safe, ethical, and survivor-centered responses. Identify key gaps where remedial 	Maintained throughout Project implementation.	All PIUs	PCU Gender/GBV Specialist/ESS PIU Community engagement officers/ESS	PCU Program Coordinator PCU M/E Specialist WB	Referral pathway developed/updated Number/type of GBV/SEA preventive and response services available Referrals of SEA/SH incidents to the project GM by other service providers	N/S	Completed and shared to PIU and continue for updating

		measures may be required <ul style="list-style-type: none"> Disseminate the referral pathway/list to stakeholders including service providers. 							
4. Inform project-affected communities about GBV/SEA H risks	4.1. Ensure that the ESMP include a Stakeholder Engagement Plan that meets the requirement in the ESS-10.	<ul style="list-style-type: none"> Reflect GBV messages in stakeholders' engagement plan activities Assess risks and impacts that project impacts on the disadvantaged or vulnerable which include inequalities between males and females or discrimination toward such groups in providing access to project benefits. 	Maintained throughout Project implementation	All PIUs	PCU Gender/GB V Specialist/ ESS PIU Community engagement officers/ESS	PCU Program Coordinator PCU M/E Specialist WB	Stakeholder Implementation Checklist integrated SEA developed The project ESMP and other E&S documents should fully describe the SEA/SH risk mitigations.	N/A	Ongoing SEP Integrated SEAH checklist developed
	4.2. Conduct community sensitization and Engagements	<ul style="list-style-type: none"> Develop a Community GBV/SEA sensitization program, material, and messages. Conduct community 	Maintained throughout Project implementation.	All PIUs	PCU Gender/GB V Specialist/ ESS PIU Community engagement officers/ESS	PCU Program Coordinator PCU M/E Specialist WB	Sensitization material developed. Number of community meetings conducted.	50,000	IEC material developed

		<p>sensitization related to GBV/SEAH and GM.</p> <ul style="list-style-type: none"> • Disseminate the relevant information on GBV/SEAH and other associated project risks i.e., human trafficking and child marriage among the wider communities and stakeholders. • Raise awareness about project risks and safety issues associated with the project facilities, and road safety, paying particular attention to the needs of males and females who are young, elderly, and/or disabled, as well as their families. • Provide appropriate measures of protection and assistance to address the vulnerabilities of 					<p>Gender inclusion ensured in Community engagements</p> <p>Community awareness campaign developed in all project sites</p>		<p>RAP integrated SEAH Checklist prepared</p> <p>Ongoing</p>
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		<p>project workers, such as women, people with disabilities and IDPs.</p> <ul style="list-style-type: none"> • Ensure in the consultation process that women's perspectives are obtained in all aspects of the project including resettlement planning and implementation. 							
	4.3. Develop relevant IEC materials for community engagements	<ul style="list-style-type: none"> • Develop relevant IEC materials translated into local languages of the project location. • IEC materials to include information on GBV response services. 	<p>Quarter 2 of contract signing</p> <p>Maintained throughout Project implementation if needed</p>	All PIUs	<p>PCU Gender/GBV Specialist/ESS</p> <p>PIU Community engagement officers/ESS</p>	<p>PCU Program Coordinator</p> <p>PCU M/E Specialist</p> <p>WB</p>	<p>Number of GBV/SEA IEC material developed</p> <p>Number of communities reached through IEC</p>		<p>IEC Materials and Billboard developed for ongoing investment</p> <p>Dissemination of IEC will keep ongoing</p>

5. GBV/SEA sensitive channels for reporting in GM	5.1. Develop/Review/ Strengthen GM for specific GBV/SEAH procedures	<ul style="list-style-type: none"> Undertake internal review of GM for GBV/SEA mitigation. Identify and Integrate GBV/SEA entry points within the GM with clear procedures and tools for management of related complaints. Develop/review SEA/strengthen GBV Allegation Procedures to report SEA/SH issues. Develop and update disclosure and reporting guidelines / protocol for GBV/ SEA/SH with a provision for victim protection and assistance. 	Maintained throughout project durations	All PIUs	PCU Gender/GBV Specialist/ ESS PIU Community engagement officers/ESS	PCU Program Coordinator PCU M/E Specialist WB	GM with GBV/SEA procedure integrated In the GM Grievance Mechanism to address SEA/SH Allegations in place and adopted. Referral Pathways of Gender Based Violence “GBV” cases in placed. Community communication scheme (Hotlines) for GM/SEA/SH reporting positioned in all PIUs		Accountability and response framework completed. Updating and training to PIUs will keep continue
	5.2. Train GM operators on how to handles GBV/SEAH cases and referrals,	<ul style="list-style-type: none"> Develop training materials on GBV/SEAH reporting for GM Operators. Identify and select GBV/SEA 	During Quarter 1 following signing of the works contract	All PIUs	PCU Gender/GBV Specialist/ ESS. PIU Community	PCU Program Coordinator PCU M/E Specialist	Training materials for GRC on GBV/SEAH developed.	160,0000	SEAH focal points identified and trained.

	reporting, confidentiality	<p>focal persons within the GM operators.</p> <ul style="list-style-type: none"> • Train the GM operators on GBV/SEA basics, the referral pathway, reporting, and Confidentiality of data. • Identify and Integrate GBV/SEAH entry points within the GM with clear procedures and tools for management of related complaints. 	Retraining every Quarter Once during project implementation when required		engagement officers/ESS	WB	<p>No. of GRC trained on GBV/SEAH integration, reporting, and referral pathways</p> <p>No of GBV/SEAH focal points identified with GRC</p>		Training for project staff and focal points will keep continue
	5.3. Disseminate information on GBV/SEAH GM reporting procedures	<ul style="list-style-type: none"> • Inform employees and the community on how to report cases of SEA/SH, CoC breaches to the GM, and how such cases are handled. • Provide and communicate easy-to-follow GBV grievance procedures for workers and 	Throughout the project duration	All PIUs	<p>PCU Gender/GBV Specialist/ESS</p> <p>PIU Community engagement officers/ESS</p>	<p>PCU Program Coordinator</p> <p>PCU M/E Specialist</p> <p>WB</p>	<p>No of sessions held with employees on reporting GBV/SEAH procedure.</p> <p>Number IEC materials related to distribute to project sited include Hotlines codes.</p>	30,000	Radio awareness at municipality conducted and will keep continuing for new investment

		community members who may be vulnerable or exposed to project induced risks.							
	5.4. Review GM reports/logs for GBV/SEA sensitivity	<ul style="list-style-type: none"> Review logs for GBV/SEA documentation to ensure it follows standards for documenting GBV/SEA cases. Allow anonymous complaints and protect confidentiality of complainants. 	During project implementation.	All PIUs	PCU Gender/GBV Specialist/ESS PIU Community engagement officers/ESS	PCU Program Coordinator PCU M/E Specialist WB	Number of GBV/SEA cases documented. Application of Survivor centre approaches through referral and documentation	N/A	Ongoing
6. Implement appropriate civil work activities to reduce SEA/SH/GBV risks	6.1. Provide separate, safe, locker and easily accessible facilities for women and men working on the site	<ul style="list-style-type: none"> Ensure design of infrastructure meets the needs of all women and girls, including safety, accessibility (based on universal design) and dignity. Safety audits will be developed for all relevant activities to ensure protection and security of affected communities and 	Before any Construction Work retaining project implementation.	All PIUs	PCU Gender/GBV Specialist/ESS PIU Community engagement officers/ESS	PCU Program Coordinator PCU M/E Specialist WB	Separate toilet and shower facilities for men and women positioned. Safety audit materials developed Number of safety audits conducted	20,000	Implemented Ongoing and completed investments. Observation checklist for female works in the

		<p>alignment with global protection standards.</p> <ul style="list-style-type: none"> • Provide separate facilities. • Design and print pamphlets and posters. • Distribute pamphlets and posters to the project site. • Install signage on the facilities Visit Project gangs/camps to check on the availability and usability of separate sanitary facilities. • Locker rooms and/or latrines should be in separate areas, with the ability to be locked from the inside. 					on project sites		constructi on site developed
7. Effective M/E system	7. 1 Develop a Comprehensive M&E Approach	<ul style="list-style-type: none"> • Develop M&E Indicators. • Under regular Monitoring. • Review GM reports/logs for GBV/SEA sensitivity. 	Maintained throughout Project implementation.	All PIUs	PCU Gender/GB V Specialist/ ESS PIU Community engagement officers/ESS	PCU Program Coordinator PCU M/E Specialist WB	Developed M&E Indicators for SEAH Monitoring reports produced	30,000	ongoing

in place to track implementation progress of GBV risk mitigation measures.		<ul style="list-style-type: none"> • Undertake annual review of the GM and the (GBV)SEA-SH system. • Monitor Contractors' implementation and adherence. • Conduct field visits. • Review quarterly the action plan and progress against indicators listed. 					Field Visits conducted/R eports GBV/SEAH M/E plan Reviewed Quarterly Reports Conducted		
	7.2 TPM to provide monitoring support to the GBV/SEA project components.	<ul style="list-style-type: none"> • Hire TPM to conduct regular reviews of the contractor's performance, including project visibility, staff awareness, and contractors reporting. 	During project implementation.	All PIUs	PCU/TPM	PCU/ World Bank	Number of internal reviews conducted and presented Mitigation plans developed	TBD	

ANNEX I A CHECKLIST FOR IMPLEMENTING ACTIONS TO MITIGATE SEA, SH AND COMMUNITY-LEVEL THROUGH THE RESETTLEMENT PLAN CYCLE

In addition to ensuring that SEA/ SH and community-level GBV issues are integrated into the RAP itself, it is useful to consider some of the key actions that should be undertaken to reduce SEA/SH and community-level GBV risks over the life of the project. To an extent these will be laid out in the RAP, at least in terms of planning for implementation of the activities. This checklist helps projects to anticipate key activities and ensure adequate budgeting. As there may be overlaps between actions needed to reduce risk for SEA and those needed to reduce risk for GBV, the checklist first lists actions related to SEA and SH and then adds additional elements that are specific to GBV.

Phase One: RAP Development
Key SEA and SH Activities
<ul style="list-style-type: none"> ✓ Undertake SEA risk analysis. ✓ Budget for SEA, SH and GBV risk mitigation and response. ✓ Consult with women and girls in the community separately about SEA concerns. ✓ Use Available GBV service providers and prepare a referral pathway for PAPs. ✓ Use Available Project GM to address SEA, SH and GBV cases. ✓ Provide RAP team related to confidentiality, reporting, whistleblower protection, complaints processing and investigations. ✓ Use established Project SEA and SH focal points in the RAP team.
Additional GBV Considerations
<ul style="list-style-type: none"> ✓ Design gender-sensitive questionnaires for socio-economic survey and asset inventory and collect and analyze gender-disaggregated data (see Annex III). ✓ Undertake community-level GBV risk analysis. ✓ Consult with women and girls in the community separately about GBV concerns. ✓ Ensure GM can address GBV cases and identify reporting protocols for the cases.
Phase Two: Compensation
Key SEA and SH Activities
<ul style="list-style-type: none"> ✓ Ensure compensation teams are comprised of males and females. ✓ Ensure compensation team members sign COC and are trained on SEA and SH. ✓ Ensure reporting pathways are in place through the GM and GBV service provider. ✓ Ensure community receives sensitization on their rights related to SEA. ✓ Develop/Use available IEC materials for communities related to SEA/SH. ✓ Ensure compensation teams receive sensitization on their rights related to SH. ✓ Ensure women are supported to participate in and lead community resettlement management groups.
Additional Community-level GBV Considerations
<ul style="list-style-type: none"> ✓ Ensure strategies for compensation engage both spouses. ✓ Ensure sensitization around risks for GBV accompany all community-level communication around compensation. ✓ Set up awareness raising or training sessions on the national laws regarding gender equality in the land titling and providing information on available legal support services. ✓ Report and Use SEAH focal points on issues related to GBV as a result of compensation.
Phase Three: Resettlement
Key SEA and SH Activities
<ul style="list-style-type: none"> ✓ Ensure a GM is in place in the resettlement areas.

<ul style="list-style-type: none"> ✓ Share GBV services Mapped in resettlements areas and conduct sensitization to resettled community about reporting and access to care and support. ✓ Adopt the available community focal points and monitoring systems for SEA in resettlement areas.
Additional Community Level GBV Considerations
<ul style="list-style-type: none"> ✓ Consider requiring both spouses to review and sign off on the household-level compensation agreement when applicable. ✓ Consider depositing compensation money in the joint bank account rather than giving cash to just one of the spouses when applicable. ✓ Assist vulnerable women to open their own bank or postal accounts to receive the compensation or other assistance money. ✓ Consider providing training on cash and budget management for both men and women ✓ Consider giving the titles or lease of the allocated land or housing to both spouses depending on the cultural or social acceptance level and taking into account the national laws and regulations. ✓ Consider setting up awareness raising campaign on the gender equality and importance of the women's participation in the resettlement process depending on the social or cultural acceptance level. ✓ Provide vulnerable households (e.g. female-headed households, widows, divorcees, disabled, elderly) vehicles for move and assistance with packing, loading and unloading, help with salvaging materials from the old house and assistance for self-construction of the new house if applicable. ✓ Provide vulnerable households, especially female-headed households with any assistance such utility services. ✓ Provide allowance for daily income lost during transition for vulnerable households or individuals. ✓ Ensure strategies to build resilience of women and girls following resettlement, including through livelihoods, access to safe spaces and other strategies that reduce GBV and facilitate reporting should cases occur. ✓ Consider setting up self-help groups or micro-credit schemes among the resettled women or linking them to the existing micro-financing schemes. ✓ Consider linking the resettled women to the existing government programs which provide skills training and job search supports. ✓ Consider introducing measures to address practical constraints that women are often facing (e.g. provision of communal childcare service, arrangement for public transport services). ✓ Encourage women's participation in the skills trainings by selecting the time and venue convenient for women and using ethnic languages or arranging interpretations for ethnic minority women.
Phase Four: Ongoing Stakeholder Engagement and Monitoring
Key SEA and SH Activities
<ul style="list-style-type: none"> ✓ Ensure ongoing stakeholder engagement plan for SEA issues. ✓ Coordination meetings are held regularly with RAP team members to review progress on SEA and SH risk mitigation. ✓ Make sure that all community liaisons in original sites as well as resettlement sites have the ability to promote the COC in the community and encourage reporting, as well as conduct ongoing monitoring. ✓ Ensure women's groups are engaged in resettlement locations as relevant.
Additional Community-Level GBV Considerations

- ✓ Define strategies to encourage and facilitate women's participation in consultation and other resettlement activities as part of the overall community engagement strategy.
- ✓ Make sure to disclose resettlement-related information in channels identified as a preferred communication medium by women through socio-economic surveys.
- ✓ Make disclosed documents or communication materials available in local languages spoken by women such as accents.
- ✓ Ensure the participation of representative of affected women in the design and implementation of M&E system of the resettlement.
- ✓ Include indicators specifically designed to measure the effect of special provisions introduced to meet women's needs or preferences.
- ✓ Coordination meetings are held regularly with RAP team members to review progress on GBV risk mitigation.
- ✓ Ensure local women's groups are engaged in resettlement locations as relevant to facilitate the safety of new arrivals to the community.

Annex II: Incorporating Gender and GBV Considerations into Assessments

Including gender-disaggregated data in the questionnaires for the socio-economic survey and asset inventory is a critical step in ensuring that rights and needs of women and girls affected by resettlement are adequately captured. Some of the key areas for analysis include:

- Land and property ownership status of women and men.
- Division of labour and decision making on finance and resource use within the household.
- Women's monetary and non-monetary contribution to household income and welfare.
- Women's dependence on assets (e.g. home garden, livestock, fruit trees) and common natural resources (e.g. water bodies, forest, grazing land).
- Women's preference on compensation, relocation and/or livelihood restoration options.
- Obstacles to women's labour market entry or business development (e.g. low education level, lack of documentation, lack of marketable skills, barriers to access to formal financing market).
- More vulnerable women within the affected communities.
- Communication channels preferred by women.

Additional strategies to ensure women are represented in the assessment include ensuring that women or female representatives are on the team of impact enumerators when identifying affected people and taking the inventory of affected assets especially for communal facilities or common properties. It may also be useful for both spouses' signatures to be required to sign off on the completed inventory questionnaire (where applicable).

Annex III: Checklist - SEA/SH Prevention and Response Action Plan and Stakeholder Engagement Plans

Response and Prevention Plan

√/x	Description	Comments
	IA developed the SEA/SH Response and Prevention Plan.	
	The plan identifies areas where women and girls feel most unsafe in relation to project specific activities.	
	The plan includes assessment of the risks of SEA/SH by the project.	
	<p>The plan includes consultations that engage with a variety of stakeholders (e.g. political and community leaders including elderly women, health teams, local councils, social workers, women's organizations and groups working with children) as follows:</p> <ul style="list-style-type: none"> - prior to, - upon commencement of and - throughout the implementation of the project. 	
	The plan includes engagement with elderly in the community including women in order to leverage on community strength and resilience.	
	The plan provides information to local communities and other stakeholders on specific SEA/SH-related mitigation measures that will be implemented over the life of the project, including the GM reporting and response measures, to keep the local communities and other stakeholders informed about the project's activities and SEA/SH mitigation measures.	
	The plan includes an Accountability and Response Framework which details how allegations of SEA/SH will be handled	

Stakeholder Engagement Plan

√/x	Description	
	PIU/Contractor developed stakeholder engagement plan (SEP) as per guidelines in GPN.	

√/x	Description	
	The plan lays out activities to properly inform those affected by the project including stakeholders, communities and vulnerable or at-risk-groups of SEA/SH risks throughout the project lifecycle.	
	The plan lays out project activities to get their feedback on project design and safeguard issues.	
	The plan identifies groups or individuals most vulnerable to SEA/SH.	
	The plan identifies areas where women and girls feel most unsafe.	
	The plan includes assessment of potential risks of SEA/SH by the project.	
	The plan includes consultations that engage with a variety of stakeholders (e.g. political and community leaders including elderly women, health teams, local councils, social workers, women's organizations and groups working with children) and other vulnerable groups prior to, upon commencement of and throughout the implementation of the project.	
	The plan includes engagement with the elderly in the community including women in order to leverage on community strength and resilience.	
	The plan provides information to local communities and other stakeholders on specific SEA/SH- related mitigation measures that will be implemented over the life of the project, including the GM reporting and response measures, to keep the local communities, vulnerable groups and other stakeholders informed about the project's activities and SEA/SH mitigation measures.	
	The plan details ongoing engagement with and feedback from these communities and stakeholders throughout the project life cycle	

Annex IV: CHECKLIST: Stakeholder Engagement Plan (SEP): Section where relevant to integrate Inclusion		
NAME OF DOCUMENT:		
DATE OF REVIEW:		
		Y/N
Introduction/ Project Description	Have specific SEA/SH risks (as defined in the SEA/SH GPN) associated with project activities been identified, based on findings from the SEA/SH risk screening from social impact assessments?	
Stakeholder identification and analysis	<p>Methodology</p> <p>Does the methodology outlined in the SEP take into account the different needs of various groups of stakeholders (including women and girls and other groups particularly at risk of SEA/SH)</p> <p>Does it provide details on how it will include vulnerable people?</p>	
	<p>Does the methodology include disaggregation of groups (by age, sex, marital status, etc.) that is needed to ensure a culturally-appropriate discussion regarding sensitive issues?</p> <p>Are safe spaces identified for women and girls to protect confidentiality of those involved in consultations? Are consultations organized at times, in places and formats that are compatible with women's other workloads and typical responsibilities? Are language or disability access barriers to participations addressed?</p> <p>Are facilitators trained to be able to facilitate safe and enabling discussions, including potentially sensitive topics such as women's and girls' safety?</p> <p>Are strategies put in place to reach out to those groups particularly at risk of SEA/SH that would otherwise be excluded by consultations with women and girls broadly (i.e. women and girls with disability, women and girls that are</p>	

	displaced or belong to minority groups, etc. depending on the groups identified).	
	<p>Affected parties</p> <p>Have women and girls been identified as a specific group affected by the project in relation to the project activities (ex-women IDPs, Poor women or vulnerable, etc.)?</p>	
Stakeholder Engagement Program	<p>Summary of stakeholder engagement done during project preparation</p> <p>Are consultations with women (or women's organizations if project locations are known) included?</p> <p>Is sufficient detail provided to understand in what form (separate group discussions with associations or with community women, individual consultations, women present at general consultations) these consultations will take place and how many women were consulted in project implementation areas as well as how they will be engaged during project implementation?</p>	
	<ul style="list-style-type: none"> • Summary of project stakeholder needs and methods, tools and techniques for stakeholder engagement. • Have the specific needs of women been identified in relation to the project activities, benefits and possible obstacles to accessing project benefits and risks? 	
	<ul style="list-style-type: none"> • Is there information regarding how women and girls will be engaged (i.e.- women and girls will be consulted in separate groups, facilitated by a woman, in a safe place, etc.)? • Is there guidance indicating that any consultations should focus on experiences and risks faced by women and girls in general but should never inquire about individual experiences of violence and/or seek to interview survivors of GBV? • Have ethical considerations regarding collecting data related to GBV been clearly outlined (i.e. need for training of data collectors, need to prioritize safety and maintain confidentiality, considerations on how to gather informed consent and establish referral protocols, etc.)? 	

	<ul style="list-style-type: none"> Proposed strategy for information disclosure Does the strategy include awareness raising on SEA/SH risks and mitigation measures for the community? Does it include separate small group engagement with women and girls and other groups that may not have full access to general information sharing, in particular groups identified as disproportionately at risks of SEA/SH? 	
	<ul style="list-style-type: none"> Stakeholder engagement plan <p>Is there a clear plan on how to engage with groups of women and girls identified as affected and interested parties?</p> <p>Does the plan take into account their specific needs or obstacles (ex: time of consultations to align with their daily tasks; ways in which they are consulted- separate from men, possibly divided by age; who animates the exchanges- a woman who speaks local language; where it is done- in a place women feel comfortable and safe; etc.)?</p>	
Resources and Responsibilities for implementing stakeholder engagement activities	<p>Resources</p> <p>Is there indication that any additional costs for more specific consultations with women and engagement on SEA/SH risks are incorporated into the overall budget?</p>	
	<p>Management functions and responsibilities</p> <p>Is the role of the GBV focal points/Specialist (<i>for projects of high risk</i>) and monitoring the implementation of SEA/SH mitigation measures defined?</p>	
Grievance Redress Mechanism	<p>Does the Grievance Mechanism (GM):</p> <ol style="list-style-type: none"> Recognize the need to adapt the procedures for sensitive complaints like SEA/SH; Have multiple entry points to report complaints including channels for SEA/SH complaints (ex. SEAH/SH Female focal points, GRC/community of local committees, GBV service providers list, Contractors Focal points, and Implementing partners focal points - all confirmed as accessible during consultations with women and girls); Clearly indicate that referral to local GBV services (at minimum medical, psychosocial and legal aid) will be 	

	<p>provided immediately after the SEA/SH complaint is reported and is linked to a referral protocol²⁹;</p> <ol style="list-style-type: none"> 4. Describes how to address SEA/SH complaints across the stages of i) sorting and processing, ii) acknowledgement and follow up, iii) verification and action, iv) monitoring and evaluation, v) provision of feedback. Outlines how survivor's safety, confidentiality and informed consent will be prioritized throughout all stages, according to existing project accountability and response framework; 5. Include information that local conflict resolution methods, traditional settlements, or other forms of informal arrangements will not be used in case of SEA/SH complaints and that the survivor has the right to seek justice at any time during the GM process, including after the process has ended; 6. Include a description of the GRC and SEA/SH focal points that will be in charge of conducting the administrative inquiry to gather evidence of alleged perpetrator's possible misconducts; 7. Highlight steps to be followed in the case of an SEA/SH incident related to an underage survivor (e.g., national legislation on mandatory reporting, Somali Penal Code and its procedures, etc.); 8. Include provisions stating that the GM operator will need to notify the PIU and World Bank of any SEA/SH incident within 24/48 hours from intake including only non-identifiable elements on the incidents such as: age and sex of the survivor, form of SEA/SH reported, whether the incident is linked to the project in the survivor's statement, and whether the survivor has been offered a referral to support services. 	
Monitoring and Reporting	<p>Involvement of stakeholders in monitoring activities</p> <p>Does the project foresee regular consultations with women and girls on risks of SEA/SH linked to the project, accessibility of the GM and project activities and the effectiveness of the mitigation measures put in place?</p>	
	Reporting back to stakeholder groups	

²⁹ Please refer Project accountability and response framework.

	Does the project foreseen various ways in reporting back to the stakeholders that include ways accessible to women and girls and other groups at risks of SEA/SH in a given context?	
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Annex V: Grievance Mechanism Checklist for Implementation Agency

General

√/x	Description	Comments
	CONTRACTOR has developed a grievance-handling process for SEA/SH cases (Grievance Mechanism).	
	Adequate resources have been allocated for the Grievance Mechanism (GM) to function effectively.	
	The GM policy was communicated to all staff and persons working on site as well as women's groups, organizations supporting GBV survivors, and other community(ies) near the project.	
	The policy is available in local language/dialect.	
	Training of all personnel handling/managing SEA/SH complaints/allegations.	

Receiving complaints

√ / x	Description	Comments
	SEA/SH grievance mechanism clearly sets out:	
	<ul style="list-style-type: none"> multiple channels to initiate a complaint/submit grievance, e.g. in person, by email, or via Contractor's website and channels that are accessible for children, individuals with disabilities, and in various languages / for individuals who are illiterate; 	•
	<ul style="list-style-type: none"> clear responsibilities on who should carry out actions and responsibilities to register complaint/allegations with clear timeframes for reporting and to whom, to maintain confidentiality; 	•
	<ul style="list-style-type: none"> confidential reporting with safe and ethical documenting of SEA/SH cases e.g. anonymized SEA/SH data with only three basic indicators of age of survivor, sex of survivor, and whether or not the incident is project-related; 	•
	<ul style="list-style-type: none"> restricted access at various locations ss the records, particularly data which can identify the survivor; 	•

• referral pathways for survivors to access health, psychosocial and legal support services including shelters (temporary accommodation), and	•
• The GM should support referrals to GBV services and record resolutions of cases.	•
There are designated personnel to handle every step of GM including GM committee	
Women and children can report to designated and trained female personnel	
Designated personnel have been trained on SEA/SH	

Investigating Complaints/allegations

√ / x	Description	Comments
	There are procedures for investigating SEA/SH allegations.	
	Procedure provides for identifying responsible personnel and staff to investigate and expeditious initiation of investigation.	
	Sets out timeframes for investigation including for the alleged perpetrator to respond to a report in accordance with local laws.	

ANNEX 6: PROTECTION OF CULTURAL PROPERTY

Cultural property includes monuments, structures, works of art, or sites of significance points of view, and are defined as sites and structures having archaeological, historical, architectural, or religious significance, and natural sites with cultural values. This includes cemeteries, graveyards and graves. Under ESS8, there will be aspects of important, intangible cultural heritage, which need consideration, especially in the ancient city of Mogadishu. Under SURP II, for example, the construction should not disturb events or ceremonials in nearby mosques or Islamic schools.

The initial phase of the proposed SURP II project interventions pose limited risks of damaging cultural property since projects will largely consist of small investments in urban road infrastructure and other relatively minor public works. Nevertheless, the following procedures for identification, protection from theft, and treatment of discovered artefacts should be followed and included in standard bidding documents.

Chance Find Procedures

Chance find procedures will be used as follows:

- Stop the construction activities in the area of the chance find;
- Delineate the discovered site or area;
- Secure the site to prevent any damage or loss of removable objects. In cases of removable antiquities or sensitive remains, a night guard shall be present until the responsible local authorities and the Ministry in charge of Department of Archaeology and Museums take over; and
- Notify the supervisory Engineer who in turn will notify the responsible local authorities and the Ministry of Culture immediately (within 24 hours or less).

Responsible local authorities and the Ministry in charge of Department of Archaeology and Museums would be in charge of protecting and preserving the site before deciding on subsequent appropriate procedures. This would require a preliminary evaluation of the findings to be performed by the archaeologists of the Department of Archaeology and Museums (within 72 hours). The significance and importance of the findings should be assessed according to the various criteria relevant to cultural heritage; those include the aesthetic, historic, scientific or research, social and economic values.

Decisions on how to handle the finding shall be taken by the responsible authorities and the Ministry in charge of the Department of Archaeology and Museums. This could include changes in the layout (such as when finding an irremovable remain of cultural or archaeological importance) conservation, preservation, restoration and salvage.

Implementation of the authority decision concerning the management of the finding shall be communicated in writing by the Ministry in charge of the Department of Archaeology and Museums. Construction work could resume only after permission is given from the responsible local authorities and the Ministry in charge of Department of Archaeology and Museums concerning safeguard of the heritage.

These procedures must be referred to as standard provisions in construction contracts, when applicable. During project supervision, the Site Engineer shall monitor the above regulations relating to the treatment of any chance find encountered are observed.

Relevant findings will be recorded in the World Bank Project Supervision Reports and Implementation Completion Reports will assess the overall effectiveness of the project's cultural property mitigation, management, and activities, as appropriate.

ANNEX 7: TERMS OF REFERENCE (TOR) FOR THE PREPARATION OF A SECURITY MANAGEMENT PLAN (SMP)

Background

The Somalia Urban Resilience Project II (SURP II)] is being implemented in Hargeisa, where security risks—such as crime, the potential for demonstrations to turn violent, and the presence of extremist groups—pose challenges to safe and effective project implementation. In accordance with international standards and the World Bank’s Environmental and Social Framework (ESF), particularly **Environmental and Social Standard 4 (ESS4): Community Health and Safety**, there is a need to develop a **Security Management Plan (SMP)** to mitigate and manage security-related risks to project workers, beneficiaries, contractors, and stakeholders.

2. Objective

The objective of the assignment is to **develop a Security Management Plan** that:

- Identifies and assesses potential security risks to project implementation;
- Outlines measures for preventing, mitigating, and responding to security threats;
- Establishes protocols for engagement with public or private security providers;

Ensures that all security arrangements are consistent with human rights, applicable laws, and international best practices.

3. Scope of Work

The consultant/team will be responsible for preparing a comprehensive Security Management Plan which should include, but not be limited to:

3.1 Risk Assessment

Mapping of security threats and actors in project areas (e.g., crime, terrorism, inter-clan tensions);

- Identification of risk levels by location and activity;
- Assessment of risks to project staff, assets, contractors, and community members

.

3.2 Stakeholder and Context Analysis

Consultation with local authorities, community leaders, security agencies, and project staff;

Review of government security policies and existing protection arrangements.

3.3 Security Measures and Protocols

Design of appropriate preventive measures (e.g., travel restrictions, curfews, safe zones);

- Recommendations for training and awareness-raising for staff and contractors;
- Emergency response plans (e.g., evacuation, medical emergencies, lockdowns);
- Procedures for safe storage, transportation, and use of equipment/materials.

3.4 Engagement with Security Forces

Guidelines for the use of public (e.g., police) or private security providers;

- Code of conduct for security personnel aligned with human rights and ESS4;
- Mechanisms for grievance redress related to security personnel behavior.

3.5 Communication and Coordination

Protocols for information sharing and incident reporting;

Communication flow within the Project Implementation Unit (PIU), contractors, and external agencies.

3.6 Monitoring and Review

Security incident tracking mechanisms;

Indicators for monitoring the effectiveness of the SMP; Regular review schedule for updating the SMP.

4. Deliverables

The main deliverable will be a **comprehensive Security Management Plan** including:

- Executive Summary
- Risk and Context Assessment Report
- Security Procedures and Protocols
- Training and Awareness Framework
- Emergency Response Plan

Annexes (maps, contact lists, checklists, etc.)

5. Timeline

The assignment is expected to be completed over a period of **[insert duration, e.g., 4 to 6 weeks]** from the date of contract signature.

6. Reporting and Supervision

The consultant will report to the **Project Implementation Unit (PIU)** and **Project Coordination Unit (PCU)** and will work in coordination with relevant government security bodies and implementing partners.

7. Qualifications

The selected consultant or firm should have:

- Proven experience in security risk assessment and security planning, particularly in fragile or conflict-affected areas;
- Knowledge of World Bank ESS4 or similar international safeguard standards;
- Experience working with development projects and local government entities;
- Strong analytical, communication, and stakeholder engagement skills

ANNEX 8: INDICATIVE ENVIRONMENTAL STEWARDSHIP FRAMEWORK FOR CONTRACTORS

This annex provides guidance on the development of the C-ESMP. The contractor should ensure inclusion of any applicable measures in a subproject ESMP (including those in the ESMF) and the subproject contract.

ENVIRONMENTAL STEWARDSHIP FOR URBAN INFRASTRUCTURE DEVELOPMENT FOR SURP II

No	ENVIRONMENTAL ISSUE	POTENTIAL IMPACT	INDICATIVE MITIGATIONS
Pre-construction/Construction Phase			
1	Land Use	<p>Passage of contractor's vehicles through grazing reserves or cultivated and forested land resulting in a permanent loss of the resources.</p> <p>Environmental effects can amplify if proper operation and maintenance schedules are not followed.</p>	<p>Plan and file Vehicular Traffic Movements (VTMs) so as to as much as possible avoid trekking through grazing reserves or cultivated, thus minimizing loss of resources.</p>
2	Material Use	<p>Excess extraction of local resources, such as wood, sand, soil, boulders, etc.</p> <p>Degradation of forests, erosion and landslide at steep locales due to bouldering and stone extraction.</p> <p>Change in river and stream ecosystem due to unchecked sand extraction.</p>	<p>Extract materials only needed on a basis.</p> <p>Avoid sensitive areas, such as steep slopes.</p> <p>Follow engineer's directions at all times.</p>
3	Slope Stability	<p>Extraction of forest products and cutting trees in steep slopes increases soil erosion and landslide due to loss of soil binding materials.</p> <p>Wrong alignment can trigger slope failure.</p> <p>Haphazard disposal of construction waste can disturb slopes.</p> <p>Improper drainage facilities can result in erosion and landslides</p>	<p>Extract carefully and secure the top soil within 25 cm from the surface.</p> <p>Limit down grading of the infrastructure such as temporary road to 50.</p> <p>If down grading exceeds 70, construction of side drainage is necessary.</p> <p>Keep optimum balance in extraction and filling of soil works geo-hazardous assessment and mapping.</p> <p>Use designated disposal site and avoid side-casting of spoil.</p>

No	ENVIRONMENTAL ISSUE	POTENTIAL IMPACT	INDICATIVE MITIGATIONS
			<p>Provide proper drainage.</p> <p>Use bio-engineering on exposed slopes.</p>
4	Wildlife	<p>Wildlife habitats at forests, shrub-lands along water infrastructure corridor are affected by the infrastructure construction activities.</p> <p>Wildlife and human conflicts increase as wildlife might destroy the crops or attack the construction workers.</p>	<p>Avoid as many areas as possible with high biodiversity.</p> <p>Efficient movement of machinery and other traffic.</p> <p>Control poaching activities and regulate movement of labour force and their dependents into the forest area.</p> <p>The District Forest or Range Office and its subsidiary body should be involved in monitoring the activities of the construction workers and officials to minimize wildlife harassing, trapping and poaching.</p>
5	Drainage	Higher flow rate of surface water and water logging induce landslides and erosion.	<p>It is strongly recommended that the cross-drainage outlets must be channeled to the confirmed natural drains.</p> <p>If horizontal slope exceeds 5%, construction of flow control device necessary every 20 m.</p>
6	Protection of Vegetation	<p>Protected areas and highly forested areas</p> <p>Degradation of forest areas</p> <p>Degradation of agricultural land</p>	<p>Minimum and efficient use of wood products for construction.</p> <p>Initiate plantation at damaged and damaged prone areas.</p> <p>Increase liability of local forest user groups.</p> <p>Avoid protected areas or densely forested areas.</p>
7	Disposal of Construction Wastes	Dumping of wastes along the infrastructure such as roads or elsewhere	<p>Selected spoil dumping sites should be used.</p> <p>After disposal, the area should be levelled and compacted.</p> <p>It is recommended to conserve the soil by planting indigenous plants including grasses.</p>

No	ENVIRONMENTAL ISSUE	POTENTIAL IMPACT	INDICATIVE MITIGATIONS
			Wastes could also be used as levelling materials along the infrastructure.
8	Disposal of Sanitary Wastes	Unmanaged sanitary waste disposal creating health problems and public nuisance	The proper sanitation area needs to be demarcated. Check for hygiene of work force.
9	Impacts on amenities	Infrastructure such as road crossings at water supply, irrigation lines may be disturbed or damaged	Avoid as much as possible the crossing over such amenities.
10	Pollution	Dust generation from construction activities, construction vehicular movement increases air pollution Noise pollution is likely from construction machinery operation and vehicular movement Sanitary problems are likely at the construction and workforce quarters.	Possibly construction period should be during any of the two rainy seasons when soil moisture content is highest in Somalia (March-May or October-December). Enforce speed limit of vehicles and construct the infrastructure such as road according to volume and size of traffic movement.
Operation Phase			
1	Encroachment	Unmanaged settlement, constructions near the new water points	Community zoning recommended, with enforcement.
3	Pollution/Vehicle Emission	Dust generation from vehicular movement increases air pollution Noise pollution is likely from vehicular movement	Enforce speed limit of vehicles. Maintain traffic size movement. Discourage use of horns.
4	Aesthetics	Infrastructure such as water construction is likely to increase landscape scars In addition, if the construction spoils are disposed of improperly, the ground vegetation would be destroyed which will be visible from a distance.	Such damage cannot be avoided but can be minimized through re-plantation of indigenous species and greenery development.

ANNEX 9: CLIMATE CO-BENEFITS COMPUTATION

Component 1: Urban Infrastructure (USD 87m)	<u>Sub-Component 1.1:</u> Preparatory Works for Urban Infrastructure (USD 6m)	<p>Since the project locations are susceptible to high temperature fluctuations and occasional flooding due to torrential rainfall, which is expected to increase in frequency and intensity due to climate change, climate resilience measures have been incorporated in the road design.</p> <p>The new roads are, therefore, designed to be of climate-resilient standards, incorporating both</p> <ul style="list-style-type: none"> ■ engineering and structural measures (including surfacing with durable materials, proper alignment of the new roads to avoid vegetative loss, and improved drainage systems to avoid erosion of road materials), and ■ bio-engineering measures (grass planting for slope stabilization wherever possible, indigenous shrub and tree planting by the road verges, vegetated stone pitching) <p>The road designs will limit the effects of flooding, especially in the densely-populated cities such as Mogadishu, as well as extreme temperatures (concerns regarding pavement integrity, e.g., softening, traffic-related rutting, embrittlement or cracking, and migration of liquid asphalt).</p>	<ul style="list-style-type: none"> ■ The climate-resilient urban roads are also designed in such a manner that the impact on already fragile biodiversity is minimized. ■ By adopting bio-engineering measures SURP II attempts to maintain the existing biodiversity in the region. ■ The newly-planted vegetation on road verges will act as natural sinks for CO₂, in addition to offering shade and other ecosystem services. 	USD3m
	<u>Sub-Component 1.2:</u> Investment in	For <u>adaptation co-benefits</u> , the narrative needs to be strengthened on this to ensure that it is clear that (i) the roads	<ul style="list-style-type: none"> ■ By improving the surfacing available for commuting, the project has 	USD80m

	Urban Infrastructure. (USD 81m)	<p>will be designed to climate resilient standards; and (ii) drainage infrastructure will be designed to climate resilient standards and reduce future flooding likely to be exacerbated by climate change.</p> <ul style="list-style-type: none"> ■ The SURP II will have climate change ancillary benefits, as the paving of currently unsealed urban surfaces in the four cities will contribute to climate change adaptation. ■ Once upgraded, the newly surfaced urban roads will contribute to mitigating traffic congestion and reducing air pollution substances such as SOx and NOx, as well as CO₂, which are major contributors of climate change. ■ During the two annual rainy seasons in the four cities (accounting for three months every year), the newly paved urban roads will have better resistance to flooding and will drain the water from the surface more easily, thus reducing the risk of potholes and water stagnation on the road surface. ■ In the dry seasons (which account for a cumulative period of nine months every year, on average), the paved surface will reduce the risk of dust vortexes and its consequences on the population. 	<p>demonstrable positive impact of mitigating traffic congestion in the four cities, thereby reducing air pollution substances such as SOx and NOx, as well as CO₂ gas emissions, all of which are major contributors of climate change.</p> <ul style="list-style-type: none"> ■ The construction of pedestrian walkways will significantly contribute to supporting non-motorized urban transport, resulting in reduction of emissions from vehicular traffic, and therefore providing climate mitigation co-benefits. ■ In addition, the construction and use of pedestrian walkways is an eligible activity for climate change mitigation. ■ The project also includes energy-efficient street lighting, which has significant climate mitigation co-benefits. 	
Component 2: Institutional Strengthening and	<u>Activity 1:</u> TA on Forced Displacement			USD6m
	<u>Activity 2:</u> TA on Operation and	<ul style="list-style-type: none"> ■ Investment in climate-resilient roads takes away the need to invest in maintenance and 		

Analytics. (USD10m)	Maintenance (O&M) of Urban Infrastructure	<p>reconstruction of damaged roads every year, especially in the FCV country context of Somalia.</p> <ul style="list-style-type: none"> ■ The TA on O&M will build the capacity of the municipalities in urban roads maintenance standards, which will include considerations of climate change impacts. ■ The four municipal governments will have enhanced road and highway maintenance capabilities to respond to climate change and climate variability. ■ The TA will also serve to induct the four municipalities with regards to how timely urban roads operation and maintenance activities can help support reduction in climate change vulnerabilities. ■ For instance, the newly upgraded urban roads can help in better distribution of relief supplies in case of natural disasters in the four cities, a departure from the previous scenarios in these operations would have damaged the road networks and obstructed relief efforts. 		
	Activity 3: TA on Subnational Governance and Service Delivery	<ul style="list-style-type: none"> ■ There will be knowledge and experiences sharing between the four city governments on governance and service delivery. ■ The TA will be structured to include the support of facilitation of dialogue on climate change impacts between the city government, in order to achieve climate resilient 		

		cities, showing the climate change adaptation benefits.		
Component 3: Project Management (USD 10m)				USD 8m
Component 4: Contingent Emergency Response. (USD 0m)				0
TOTALS		87% climate co-benefits estimates		USD97m

Annex 10: SUMMARY OF AF4 CONSULTATIONS CONDUCTED IN HARGEISA

Introduction

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

Institutional Arrangements and Legal Framework

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

- Hargeisa is the capital and largest city of Somaliland which self-declared independent 1991 and aspires to be recognized as a country and a member of the United Nations.
- City has an estimated population of 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 behavior 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 recognized a country and a member of the United Nations.
- City has an estimated population of 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 neighborhoods.
- Environmental considerations in urban infrastructure projects are emphasized in **article 18**, which mandates the state to protect the environment and manage natural resources responsibly.
- The legal and regulatory framework for urban infrastructure in Somaliland establishes clear mandates for municipal governments, national ministries, and agencies.
- The Local Government Law (Law No. 23/2002) grants municipal councils authority over urban planning and public services, including roads and drainage systems.
- The Urban Land Management Law (Law No. 17/2001) regulates land use and grants municipalities oversight of urban expansion and zoning for infrastructure projects.
- The Somaliland Roads Act (Law No. 55/2012) classifies roads and assigns maintenance duties, with local governments responsible for municipal roads while national roads fall under the Somaliland Road Development Authority (SRDA).
- The Hargeisa Local Government has adopted the use of cloud-based accounting system (Financial Management Information System.). The city's annual budget average has been USD 19 million over the last 3 years.
- Hargeisa Local Government has developed a MIS system to manage local government operations including tracking customer service (also covers grievances).
- Hargeisa Local Government has developed a MIS system to manage local government operations including tracking customer service (also covers grievances).
- The HGL has a Social Affairs Department which is also responsible for environmental management.
- Among the city's income sources is a rehabilitated water-retention pond that is used to supply water for the construction industry.
- Several key state government institutions in Somaliland are involved in infrastructure development including the **Ministry of Environment and Climate Change (MoECC)** which addresses urban environmental issues, including waste management, pollution control, and green space development.
- The city has an established property register that provides disaggregated data including whether the land is built or vacant, ownership (public or private), and type of structure.

Social Cultural Aspects to Be Considered in Planning for Investments

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

Infrastructure Related Challenges Facing the City

- Hargeisa faces persistent infrastructural challenges that significantly impact the daily lives of its residents.
- Water supply and sanitation services remain inadequate, resulting in frequent shortages and reliance on water trucking in many neighbourhoods.
- Electricity supply is unreliable, forcing many households and businesses to depend on private generators due to inconsistent access to power.
- One of the major concerns in Hargeisa is the poor drainage system, which leads to frequent flooding during the rainy season.
- Inadequate drainage infrastructure causes water stagnation, damaging roads, increasing the risk of waterborne diseases, and disrupting daily activities.
- Waste management is a pressing issue although significant clean-up campaigns have occurred, and the city is now clean.

- The road network in the periphery sub-districts is in poor condition, with rough and unpaved roads creating significant mobility challenges. These conditions have particularly severe consequences for pregnant women, the elderly, and individuals with health conditions who struggle with transportation due to the bumpy and uneven roads.
- The frequent breakdown of vehicles due to poor road conditions further exacerbates transportation difficulties, leading to costly repairs, increased travel time, and higher transportation expenses for residents.
- Many residents, including internally displaced persons (IDPs), must travel long distances from their homes to reach bus stops, markets, and essential services. This poses a particular burden on school children, elderly individuals, and pregnant women, who are often forced to walk long distances due to the lack of accessible public transport. The absence of well-planned transportation routes makes daily commuting more difficult, further straining vulnerable populations.

Project Background and Design

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

Outcome of the consultation held with community members

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

Job Opportunities

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

Gender

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

Security Concerns

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

Gender Based Violence

- High risk for IDPs who live in the city peripheries where there is no lighting.
- Case of attempted rape of a woman IDP by a public bus driver was mentioned. Case currently in Court.

Involuntary 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.
- 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 a need for land acquisition, which is unlikely looking at the proposed investment, the government has the capacity to allocate such land.
- The inclusion of informal vendors and micro-enterprises in the project's compensation framework.
- Vendors eligible under the entitlement matrix will receive advance written notification prior to construction, allowing them to relocate with dignity and minimal loss.
- The RAP will incorporate verification procedures to ensure their entitlements are fulfilled.

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

Stakeholder Engagement and Grievance Management

- Community members from the sub-districts indicated they were happy to be consulted and hoped their input would be taken into consideration.
- Some members of the civil society indicated the municipality needed to improve its engagement with the civil society. 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

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 overflowing 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.

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.

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.

	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 neighborhood 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.

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

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

	Road Name	District	Length	Estimated Cost (USD)	Justification provided by the community, civil society and the local government
	Road Name	District	Dimension	Construction Cost	Justification provided by the community, civil society and the local government
1	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	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

	Road Name	District	Length	Estimated Cost (USD)	Justification provided by the community, civil society and the local government
					<p>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					
	Culverts/Bridges		Road Name	Construction Cost	Notes
1	Boqol Jire Bridge	G/Dheere		1,000,000 USD	This is the only bridge and route connecting the district to 31 May and Gacmo Dheere sub-districts as well the rest of Hargeisa, making it a critical link for transportation and access to essential services. This bridge is a vital connection for the sub-district, linking the community to other districts, essential services, and livelihood opportunities. However, during the rainy season, the entire community is cut off, making movement impossible.
6) Gacan Libaax sub-district					
	Road Name	District	Length	Construction Cost	Notes
1	Boqol iyo konton	G/Libaax	1.6 Km	1,280,000	
	Daami Retention Pond				This water catchment was previously home to the Gabooye (ethnic minority community) where many lives were lost during floods each rainy season To address this,

	Road Name	District	Length	Estimated Cost (USD)	Justification provided by the community, civil society and the local government
					<p>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	

	Road Name	District	Length	Estimated Cost (USD)	Justification provided by the community, civil society and the local government
	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 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

	Road Name	District	Length	Estimated Cost (USD)	Justification provided by the community, civil society and the local government	
					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.	

Annex 11: APPROACH FOR INCLUSION OF DISADVANTAGED GROUPS

A. Introduction

The project aims to prioritize the needs of disadvantaged groups identified during stakeholder consultations, which include minority clans, Internally Displaced Persons (IDPs), Persons with Disabilities (PWDs), youth, and women, among others.

To facilitate their participation and ensure they benefit from the project, contractors will implement Environmental and Social (E&S) assessments and management plans that identify barriers faced by these groups. The strategies will be integrated into the contractors' Stakeholder Engagement Plans (SEPs) and community outreach efforts. Training sessions for service providers and project staff will emphasize the importance of fostering inclusion and diversity in staffing.

The project will consider both physical measures and accessible formats for communication, such as providing information in sign language and braille, as applicable. Special attention will be given to ensuring that separate and culturally appropriate sanitary facilities are available for male and female workers, to mitigate the risk of gender-based violence (GBV) and sexual exploitation and abuse/sexual harassment (SEAH).

Recognizing that social, economic, and physical barriers hinder the involvement of vulnerable groups—such as financial constraints, inaccessibility of meeting venues, social stigma, and inadequate awareness—the project will adopt effective strategies to engage these communities, to promote greater inclusion in participation.

Given the risks of clannism, nepotism, elite capture, and potential exclusion of these vulnerable groups, the social safeguards team at the FGS and PIU will ensure that the implementing partners take specific steps to reach disadvantaged communities. Efforts will include promoting their inclusion in consultations and ensuring equitable access to project benefits and opportunities.

B. Engaging disadvantaged or vulnerable groups

The project aims to enhance the inclusion of disadvantaged or vulnerable groups by actively and meaningfully engaging them in consultations during the sub-project design, development and implementation of ESMPs. This will include ensuring that infrastructure facilities built under the project are accessible to individuals with physical disabilities, incorporating features such as ramps and rails where needed.

Training for community and project staff will focus on non-discrimination and ensuring that urban infrastructure facilities are accessible to all. Significant efforts will be made to train staff in the inclusion of all disadvantaged groups, as well as addressing age-related needs.

Codes of Conduct, ethical guidelines, and procedures will be established to ensure the safe and appropriate provision of urban services. Furthermore, project and contractor staff will receive training on the heightened risk of SEA/SH faced by individuals with disabilities, including specifics for women, girls, boys, and men, along with guidance on the sensitive identification and support of PWDs who have experienced such violence, maintaining confidentiality throughout.

The project recognizes the need to identify and address social barriers that hinder access to information and services for these groups, such as discrimination and stigma. Engaging stakeholders and local communities will play a crucial role in sensitizing community-level structures, as well as in establishing effective processes for receiving, managing, and addressing complaints and grievances related to the project. The understanding is that local communities have a better grasp of their vulnerabilities compared to external actors, thus making their engagement vital, especially in settings with limited administrative capacity.

The participation of disadvantaged groups in selecting, designing, and implementing project activities will be essential for the success of this Inclusion Plan. When adverse impacts are anticipated, the FGS PMU and PIU will conduct prior informed consultations with the communities that may be affected, along with those

knowledgeable about local development issues and concerns. The primary objectives will be to:

- a. Understand the operational structures in the respective communities;
- b. Seek input/feedback to avoid or minimize the potential adverse impacts associated with the planned interventions; and
- c. Identify culturally appropriate impact mitigation measures.

Consultations will be conducted in two main stages. Initially, before any project activities begin, the implementing agency will hold discussions with community leaders and representatives of disadvantaged groups to address the necessity of the project and its potential positive and negative impacts. This will form part of the development of the ESMPs. The second stage will involve ongoing stakeholder engagement, ensuring that disadvantaged groups remain actively involved throughout the project, particularly as part of the contractors' SEP and monitoring efforts.

The implementing entity will:

- Facilitate broad participation of disadvantaged groups, ensuring adequate representation across gender and generations, including local leaders such as community elders/leaders, religious leaders, and community-based organizations (CBOs).
- Provide these groups with comprehensive information about the project, particularly regarding any potential adverse impacts and appropriate mitigation measures.
- Ensure that communication methods are suitable for the local context, taking into account the low literacy levels, local dialects, and specific challenges faced by persons with disabilities (PWDs).
- Organize and conduct consultations in formats that encourage open expression of views and preferences.
- Document the details of all consultation meetings with disadvantaged groups, focusing on their perceptions of project activities and the associated impacts, especially any negative effects.
- Share any input or feedback received from the target populations.
- Provide a clear account of the agreements reached with the consulted individuals.
- Implement a targeted approach through a local labour recruitment plan to ensure that disadvantaged groups, including PWDs, minority clans, IDPs, and women, benefit from employment opportunities created by the project.

Once the disadvantaged groups are identified in the project area, this Inclusion Plan will ensure that measures are implemented promptly to mitigate any adverse impacts of the project. The project shall guarantee that disadvantaged groups are consulted and have access to a trusted Grievance Mechanism (GM) for voicing any complaints related to the project.

To avoid marginalizing these groups, it is essential that representation from these groups is included in the Grievance Committee (GC) that handles grievances and complaints at the community level.

The following issues will need to be addressed during the project's implementation phase:

- Establish an effective monitoring mechanism for the implementation of the Inclusion Plan by the PMU, PIU, E&S team, contractors and other implementing partners;
- Engage experienced CBOs and NGOs to specifically address the needs of disadvantaged groups by developing and implementing targeted action plans focused on specific issues;
- Ensure that an appropriate budget is allocated for the contractors' Inclusion Plans as part of their ESMPs; and

Provide technical assistance to sustain efforts that address the needs of disadvantaged groups.