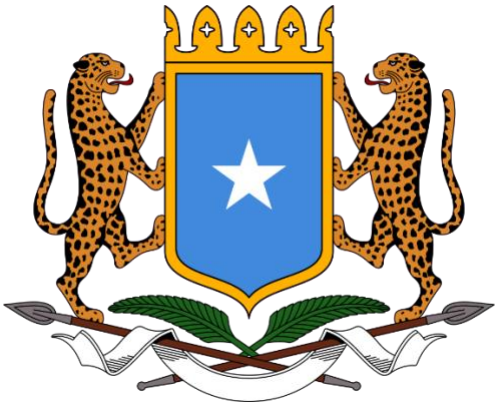
FEDERAL REPUBLIC OF SOMALIA



MINISTRY OF PUBLIC WORKS, RECONSTRUCTION AND HOUSING

Environmental and Social Management Framework

Somalia - Horn of Africa Infrastructure Integration Project (P173119)

THIRD DRAFT
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List of Abbreviations and Acronyms

AfDB	African Development Bank
BRA	Benadir Regional Administration
CERC	Contingent Emergency Response Component
C-ESMF	Contractor's Environmental and Social Management Framework
CoC	Code of Conduct
COVID-19	Coronavirus Disease 2019
CSOs	Civil Society Organizations
DOSH	Director of Occupational Safety and Health
EAFS	External Assistance Fiduciary Section
EAs	Environmental Audits
EHSGs	Environment, Health and Safety Guidelines
EIA	Environmental Impact Assessments
EQS	Environmental Quality Standards
ESF	Environmental and Social Framework
ESIA	Environmental and Social Impact Assessment
EU	European Union
FEWSN	Famine Early Warning Systems Network
FGM/C	Female Genital Mutilation/Cutting
FGS	Federal Government of Somalia
FMS	Federal Member States
GBV	Gender Based Violence
GCF	Green Climate Fund
GDP	Gross Domestic Product
GEF	Global Environment Facility
GHG	Greenhouse Gas
GM	Grievance Mechanism
GRC	Grievance Redress Committee
GRS	Grievance Redress Services
HADMA	Humanitarian Affairs and Disaster Management Agency
HIPC	Heavily Indebted Poor Countries
HoA	Horn of Africa
ICT	Information Communications and Technology
IDA	International Development Association
IDP	Internally Displaced People
IFC	International Finance Corporation
ILO	International Labor Organization
IOM	International Organization for Migration
IPF	Investment Project Financing
IRM	Immediate Response Mechanism
LRP	Livelihood Restoration Plan
M&E	Monitoring and Evaluation
MCT	Ministry of Communication and Technology
MFMR	Ministry of Fisheries and Marine Resources
MoC	Ministry of Commerce

MOCT	Ministry for Communication and Technology
MoE&T	Ministry of Environment and Tourism
MoEACC	Ministry of Environment, Agriculture and Climate Change
MoEM	Ministry of Energy and Minerals
MoEWR	Ministry of Energy and Water Resources
MoF	Ministry of Finance
MOLSA	Federal Ministry of Labor and Social Affairs
MoPIC	Ministry of Planning and International Cooperation
MoPIED	Ministry of Planning Investment and Economic Cooperation
MoU	Memorandum of Understanding
MPA	Multiphase Programmatic Approach
MPMT	Ministry of Ports and Marine Transport
MPWRH	Ministry of Public Works, Reconstruction and Housing
MTCA	Ministry of Transport and Civil Aviation
NERAD	National Environment Research and Disaster-preparedness
NTP	National Transport Policy
ODF	Open Defecation Free
OHS	Occupational Health and Safety
MoECC	Ministry of Environmental and Climate change
PCU	Project Coordination Unit
PDO	Project Development Objectives
PESS	Population Estimation Survey of Somalia
PET	Annual Potential Evapotranspiration
PMTs	Project Management Teams
POPs	Persistent Organic Pollutants
RPF	Resettlement Policy Framework
SDGs	Sustainable Development Goals
SEA	Sexual Exploitation and Abuse
SEAs	Sectoral Environmental Assessments
SEP	Stakeholder Engagement Plan
SHIIP	Somalia - Horn of Africa Infrastructure Integration Project
SL	Somaliland
SPA	Somali Ports Authority
TA	Technical Assistance
TFG	Transitional Federal Government
TNG	Transitional National Government
ToRs	Terms of Reference
TSC	Technical Steering Committee
UN	United Nations
UNDP	United Nations Development Program
UNFPA	United Nations Fund for Population Activities
UNICEF	United Nations International Children's Emergency Fund
UNOPS	United Nations Office for Project Services
US$	United States Dollar
VTMs	Plan and file Vehicular Traffic Movements
WB	World Bank

WBG	World Bank Group
WHO	World Health Organization

Executive summary

The Environmental and Social Management Framework (ESMF) for the Somalia - Horn of Africa Infrastructure Integration Project (SHIIP) outlines the approach for managing potential environmental and social (E&S) risks associated with the project. SHIIP, financed by the World Bank, aims to enhance Somalia's infrastructure capacity, focusing on preparing and implementing economic corridor projects that are crucial for the country's integration with the greater Horn of Africa.

The overall environmental and social risk rating for SHIIP is "High" under World Bank's Environmental and Social Risk Classification System (ESRC). SHIIP is subject to World Bank's new Environmental and Social Framework (ESF) which requires the preparation of environmental and social safeguards instruments that will ensure the avoidance or mitigation of any adverse impacts or risks while enhancing positive impacts of projects that are financed by the Bank.

Inclusion Plan. To address the risk of exclusion of disadvantaged and vulnerable populations in the project areas, this ESMF includes a dedicated Inclusion Plan, which is also integrated into the Stakeholder Engagement Plan (SEP). The plan identifies and targets groups that may be underrepresented or underserved, including minority clans and castes, Internally Displaced Persons (IDPs), residents of remote or conflict-affected areas with limited access to services, nomadic pastoralist communities, persons with disabilities (PWDs), and female-headed households—including orphans and unaccompanied minors.

Targeted measures will be implemented to ensure these groups are meaningfully engaged throughout the project lifecycle, including during sub-project design, the development of Environmental and Social Management Plans (ESMPs), implementation, and monitoring. The Inclusion Plan is fully operationalized through the SEP to comply with the World Bank's Environmental and Social Standard 10 (ESS10), ensuring inclusive, equitable, and transparent stakeholder participation at all stages of the project.

Key objectives of the project include:

1. Development of Regional Economic Corridors: The project will prepare approximately 550 km of prioritized regional economic corridors, including necessary designs, E&S safeguard instruments, and economic analysis. This component also considers climate risks and includes preparatory work for associated infrastructure, such as transmission lines and digital development.

2. Connectivity to Economic Corridors: The project will also prepare studies for about 900 km of secondary and tertiary roads connected to the identified corridors. These roads will enhance local connectivity, contributing to the broader economic integration goals by linking fragmented regions within Somalia.

Given the high E&S risk classification of the project, ESMF provides guidelines for mitigating these risks, including:

- Screening and Assessing Risks: Procedures for screening E&S risks and impacts are established, along with steps for review, approval, and implementation of activities.

- Stakeholder Engagement: A plan for engaging stakeholders, including vulnerable and disadvantaged groups, to ensure their input is incorporated into the project.

- Capacity Building: The project includes capacity-building activities to ensure that the Federal Ministry of Public Works Reconstruction and Housing (MPWRH) and its partners can effectively manage the identified risks.

- Grievance Redress Mechanism (GRM): A GRM is established to handle complaints and grievances from affected parties throughout the project lifecycle.

Under the Stakeholder Engagement Plan (SEP), three key consultation meetings were held:

- First Meeting (April 25, 2021): Conducted virtually due to COVID-19, this meeting aimed to identify key stakeholders. Seven out of ten invited federal institutions attended. Discussions focused on stakeholder roles, information disclosure, and grievance redress. A follow-up meeting was planned but cancelled due to political unrest in Mogadishu.
- Second and Third Meetings (July 18 & 29, 2021): These sessions continued discussions on stakeholder engagement processes, finalized grievance mechanisms, and consolidated feedback. Broad participation ensured alignment and commitment to inclusive project implementation.

These consultations established a foundation for effective and transparent stakeholder engagement throughout the project.

Framework Adaptability and Collaboration:

The ESMF is designed to be a living document, updated regularly to reflect new risks, impacts, and mitigation measures as the project evolves. The successful implementation of the ESMF will require coordinated efforts from various government ministries, international partners, and community organizations.

Chapter 1 – Introduction

1.1. Project Background

1. The World Bank proposes to engage and support the Federal Government of Somalia (FGS) and enhance the government's capacity to unlock the economic potential of Somalia's development corridors. This will be achieved through implementation of activities under the proposed Somalia Horn of Africa Infrastructure Integration Project (P173119 or 'SHIIP'). SHIIP aims to prepare the foundation for the economic integration of Somalia with the greater Horn of Africa ("HoA"). The proposed project aims at supporting capacity development and undertaking of distinct analytical and technical studies for:

- Regional specific activities identified under the HoA Initiative related to economic corridors (roads and trade, and related digital infrastructure, energy interconnections as may be applicable),
- National specific activities associated with localized linkages to the economic corridors and interconnection between member states.

2. This will be achieved by preparing the initial cycle of investment-ready pipelines and broad-based regional corridor infrastructure, laying the foundation for good sector management by taking institutional and capacity-building initiatives anchored in professional sectoral analysis. In particular, the proposed project will address sector analytical gaps and prepare necessary feasibility and technical studies and designs necessary for future project investments in these sectors, while establishing building blocks for medium to longer term capacity building. Although no civil works are envisioned under this project, the various studies and capacity building activities are intended to lay the groundwork for future work and potential follow-on projects.

1.2. ESMF Rationale and Objectives

3. The proposed Project will be financed by the World Bank and seeks to prioritize regional economic corridors of about 550 kilometers (km), subject to technical preparation and brought to the bidding stage. Additionally, the Project will embark on preparation of feasibility, design, and other studies necessary to prepare and bring to the bidding stage approximately 900 km of secondary and tertiary roads linked to the identified corridors, connecting the local population to the expanded opportunities presented by increased trade and economic development induced by the eventual investment in the economic corridors. Trade and economic developments will include other important infrastructures and services, such as transport, transmission lines, fisheries and ports. The exact locations and the subprojects, likely to be financed under this Project, are not fully known at this stage. The ESMF, based on the requirements of ESS1 - Assessment and Management of Environmental and Social Risks and Impacts, is triggered and implementation committed through the Environmental and Social Commitment Plan (ESCP), by which Government of Somalia has entered into agreement with the World Bank.

4. The ESMF sets out the principles, rules, guidelines, and procedures to assess the environmental and social (E&S) risks and impacts of the Project. It includes measures and plans to reduce, mitigate, and/or offset adverse risks and impacts, provisions for estimating and budgeting the costs of such measures, and information on the agencies responsible for managing these risks and impacts, including their capacity. The ESMF also provides information on the areas in which subprojects are expected to be sited, the potential environmental and social vulnerabilities of those areas, and indicative mitigation measures that may be required.

Additionally, the ESMF aligns with relevant national environmental and social laws and regulations of the Federal Government of Somalia (FGS) and participating Federal Member States, including the Somalia Environmental Proclamation (2019), National Environmental Policy, and applicable sectoral regulations. Instruments such as Environmental and Social Impact Assessments (ESIAs), Environmental and Social Management Plans (ESMPs), Resettlement Action Plans (RAPs), and

Labor Management Procedures (LMPs) will be developed and implemented, as required, for each subproject. These will be applied during project implementation by the Federal Ministry of Public Works, Reconstruction and Housing (MPWRH), state-level administrations in the participating Federal Member States, the Banadir Regional Administration, and Somaliland, alongside relevant line ministries, departments, agencies, development partners, private sector actors, and community-based organizations.

5. The Project Coordination Unit (PCU), based at the MPWRH, and the Project Management Teams (PMTs) at the Federal Member State (FMS/BRA) level, as well as UN and contractors will use and refer to this ESMF during implementation of the project. Where appropriate, Environmental and Social Management Plans (ESMPs) will be prepared during project implementation following guidelines provided in this ESMF. It remains the responsibility of the safeguards' focal persons (environment and social) with the PCU, and their counterparts at the State levels, to ensure that the necessary mitigation plans are developed and adhered to by the Project actors. All contractors will provide ESMPs covering all E&S requirements, including area specific inclusion plans for specific activities that will be approved by the PCU and cleared by the World Bank before contracting. In addition, they will provide specific contractor ESMPs (C-ESMP) as part of the periodic intervention plans, to be cleared by the World Bank before implementation. The UN agencies that will oversee E&S implementation in Somalia will be required to support and facilitate the development of the relevant safeguard measures.
6. The principal objective of the ESMF is to assess and mitigate potential E&S risks and impacts of the Project as per the requirements of the World Bank's Environmental and Social Framework (ESF) and in tandem with the regulations established by the Federal Government of Somalia (FGS). Specifically, the ESMF will help the FGS and partners to:

- Assess the potential E&S risks and impacts of the Project and propose appropriate and effective mitigation measures.
- Establish procedures for screening E&S risks, as well as recommend steps for review, approval, and implementation of activities.
- Specify the appropriate roles and responsibilities of the MPWRH and its partners, and outline the necessary reporting procedures, for managing and monitoring E&S issues related to the activities.
- Identify the training and capacity building needed by the agencies and partners of the FGS to successfully implement the provisions of the ESMF.
- Outline the mechanism for public consultations and disclosure of project documents as well as redress of possible grievances; and
- Establish the budget requirements for implementation of the ESMF and the related instruments, which are specified in this ESMF.

1.3 ESMF Methodology

7. This ESMF was prepared through a process that involved literature review and stakeholder engagement. The Somali government team, in close collaboration with the World Bank, undertook a review of project documents, including Project Concept Note (PCN), Project Operational Manual (POM) and Project Appraisal Document (PAD), in order to establish the actual Project design and E&S risks thereof. The team also jointly conducted a review and analysis of relevant Somali legislation, policies, and guidelines, in addition to the World Bank's ESF, and the ESSs relevant to this project. Consultation with key stakeholders in the application and implementation of the ESMF for the project was initially conducted virtually for kickoff and planning purposes from April 2021 to July 2021, as detailed in the Project's SEP. The main objective of the consultation was to share the proposed E&S risk management framework for the Project and receive input and suggestions from the stakeholders. The meeting saw active

participation of sector stakeholders, community representatives (including representatives of vulnerable and disadvantaged groups), Project target groups, national and international NGOs working in the trade and transport sector, among others. Critical issues and recommendations have been incorporated into the ESMF documents.

8. As required by ESS1 the Borrower is obligated to assess relevant and context-specific Project E&S risks and impacts. Additionally, the Borrower is required to manage E&S risks and impacts of the project throughout the project life cycle in a systematic manner, proportionate to the nature and scale of the project and the potential risks and impacts. In addition, adverse impacts, depending on the degree of risk, should be avoided, eliminated, minimized, mitigated, or accepted. The overall Environmental and Social Risk Classification (ESRC) of the project is "High." This ESMF has been developed for the Project as per the rationale above.
9. As there are potential positive and negative E&S risks and impacts on the Project beneficiaries who are collectively referred to as Project Affected Persons (PAPs), mitigation and management planning measures are proposed in this ESMF according to best management practices, and have been aligned to the design of the Project to allow for ease of application.
10. The risks and impacts presented in this document will be updated frequently throughout the Project life cycle. Before the implementation of Project's activities and interventions, additional stakeholder engagement will be carried out and feedback of E&S aspects will be incorporated as necessary.

Chapter 2 – Project Description

2.1. Objectives

11. SHIIP is a technical assistance intervention aimed at facilitating project preparation and capacity building in the infrastructure sector for Somalia authorities. The project will not finance any infrastructure or activities which may have direct E&S footprints on the ground: instead, it will finance detailed studies for pipeline projects in transport, power, IT sectors that might have significant potential E&S risks and impacts when these investments materialize. As such, the E&S risk rating for the project is 'High'.

12. Part of the SHIIP objective and activities will be to enhance Somalia's E&S risk assessment and management systems, to comply with good international practice, including the World Bank's ESF.

2.2. Development Objectives

13. The Project Development Objective (PDO) is to prepare a spatially coordinated investment pipeline of economic corridor projects, and to strengthen the National Government's management of the transport and trade sectors. Key results include:

- Value (US$) of spatially coordinated pipeline projects prepared which are ready for investment.
- National Transport Policy (NTP) developed and submitted to portfolio ministry for approval (Y/N).
- Enabling environment of trade within Somalia formulated (# of activities completed); and
- Capacity of PCU for project management (as determined by capacity audit).

2.3. Project Components

Component 1: Development of Regional Economic Corridors

14. It is expected that close to 550 km of the prioritized regional economic corridors will be subject to technical preparation and brought to the bidding stage. Identified sections will be assessed to identify relevant improvements needed and preparatory works conducted including design of the road works, E&S safeguards instruments, and economic analysis. Upon identification of a corridor and corridor road sections for design, this component will finance diagnostics of area-wide trade facilitation and development measures and actions aimed at augmenting the trade viability of the corridor. Where FGS strategies and plans for new transmission lines and digital development coincide linearly with selected economic corridor designs, the design of these will be undertaken.

15. A methodology for prioritization was established in the preparation of this project to determine the priority sections to be included in the project in an objective manner. Climate risks and vulnerability were considered in road prioritization. Annex 1 is a description of primary road corridors within Somalia, largely aligned with those identified in the HoA Initiative, of which the project will finance a subset for design studies. Within prioritization, eventual corridors and road sections are expected to be subject of discussion between FGS and FMS. While optimally the component will support development of a contiguous corridor, the prevailing political and security considerations may require financing preparation of corridor sections that are not contiguous.

Component 2: Connectivity to Economic Corridors

16. This Component will prepare a suite of national level activities intended to leverage the development of economic corridors through local connectivity and accessibility. While not specifically cross border regional integration activities, the identified projects will be those

which complement the regional nature of the project, either by providing complementary investments to those in Component 1 or building links between the fragmented member states of Somalia. Specifically, the component will finance activities which include the following:

- Preparation of Feasibility, design, and other studies necessary to prepare and bring to bidding stage approximately 900 km of secondary and tertiary roads linked to the identified corridors, connecting the local population to the expanded opportunities presented by increased trade and economic development induced by the eventual investment in the economic corridors. Climate resilience considerations will be integrated in road design studies.
- Design of new transmission lines and digital development to coincide linearly with selected roads, including an integrated energy demand assessment covering transport, digital and fisher's sector development loads to adequately estimate power needs for priority sites.
- Assessment of the fisheries sector's infrastructure (docks, cold chain, processing, etc.) and services (unloading/transshipping, supplying, bunkering, repairs, etc.) for their potential as economic drivers for particular value chains. Specific activities could include i) opportunity and cost benefit analyses for fishing, or multi-usage ports along the coast of Somalia, ii) needs assessment and investment plan for pre- and post-harvest infrastructures in major ports and in smaller ports, as well as other services activities, iii) detailed feasibility studies for fishing or multi-usage port developments and associated infrastructures, iv) associated safeguards instruments, and v) climate risks and port vulnerability assessments;
- Assessments geared to linked ports (Mogadishu, Kismayo, Bossaso and/or Berbera), such as operational or environmental assessment and associated designs that fit within the ports designated public domain; and
- Area-wide trade facilitation and development aspects, reflecting prioritized regional economic corridors selected for technical preparation under component 1.

Table 1:Summary of Component 2 Activities and Associated Environmental & Social Considerations

Sub-Activity	Scope / Objective	Potential E&S Risks / Impacts	Indicative Safeguard Instruments
Secondary & Tertiary Road Design (900 km)	Technical design and feasibility studies for regional feeder roads	Land acquisition, resettlement, biodiversity disturbance	ESIA, RAP, ESMP
Transmission Line Design	Design of electricity transmission infrastructure along corridors	Right-of-way clearance, community safety, visual impacts	ESIA, ESMP
Integrated Energy Demand Assessment	Forecast power needs across transport, digital, and fisheries clusters	None directly, but informs location and scale of energy infrastructure	Strategic Screening, Integration with ESIAs
Digital Development Planning	Planning for digital connectivity infrastructure in corridor zones	Low direct impact, minor construction disturbances	Screening Report, ESMP (if needed)
Fisheries Sector Infrastructure Assessment	Evaluate gaps in fisheries infrastructure and service provision	Livelihood disruption, access strictions, construction-related impacts	ESIA, ESMP
Port Opportunity & Cost-Benefit Analyses	Evaluate viability of small and multi-usage ports along the Somali coast	Marine habitat impacts, sedimentation, community access	Marine ESIA, Feasibility Studies
Pre- and Post-Harvest Needs Assessment	Assess and plan infrastructure at major and minor ports	Waste management, cold chain emissions, land acquisition risks	ESIA, Environmental Audit
Feasibility Studies for Fishing/Multipurpose Ports	Detailed studies for port infrastructure, layout, and access roads	Dredging impacts, displacement, coastal erosion	Full Marine ESIA, RAP, Livelihood Restoration Plan
Associated Safeguards Instruments Preparation	Cross-cutting development of environmental and social instruments for all activities	Cumulative impacts, sector-specific risks	ESIA, ESMP, LMP, SEP, IPP, GM Plans

Component 3: Institutional and Capacity Development

17. This component will support select institutional and capacity development within the FGS,[1] especially within the transport and trade sectors. Effective planning, implementing, maintaining and governing the infrastructure sector and monitoring service efficiency requires strong institutions with sufficient resources and technical, managerial, planning, procurement, financial management and socio-environmental skills. This component aims at creating a base for this to occur over time. A framework for institutional development needs to be formulated, understanding of sectoral issues needs to be sustained through appropriate analytical undertakings and human resource capacities built.

18. Capacity building activities have been selected with a long-term vision of sectoral development, identified to serve as first steps on a long road towards a forward-looking institutional and sectoral vision. Recognizing that major infrastructure gaps exist, resulting from decades of conflicts and fragility, the institutional capacity must be strengthened in all sectors. Within this project, capacity building activities are focused on the planning, implementing, and leveraging economic corridors, including activities in transport and trade as well as those associated with planning integrated corridors. As may be considered appropriate during the implementation of the project, the identified activities may be delivered as a stand-alone activity or integrated into larger pieces of assignments to streamline delivery and avoid overwhelming beneficiaries. In addition, the activities will be phased throughout project implementation in order to moderate the demand for implementing and beneficiary agencies. Overall, training programs will be financed on targeted basis as a complement to capacity development to be achieved through hand-on exposure and technical assistance (TA) work. Capacity and analytical support will include:

Transport:

- Development of the NTP with TA and under the guidance of the Ministry of Transport and Civil Aviation (MTCA), for the purpose of framing a comprehensive guidance to all stakeholders on Somalia's long-term development of the transport sector; it would be expected that these policies be informed by or integrated with other sector priorities and potential trade flows. The ToRs for this assignment will incorporate MTCA capacity development as one key objective.
- Development of a transport sector climate strategy, with the identification of policy, regulatory, and institutional capacity measures needed to enhance the resilience of the transport sector. Such strategy would be informed by climate and natural hazards vulnerability assessment for the Transport sector and development of guidance materials on how to integrate climate resilience considerations in road design and construction, and port rehabilitation and expansion.
- Development of a Road Sector Strategy under the NTP framework, aimed at providing safe, economic, efficient, climate resilient and sustainable road infrastructure.
- Development of a National Highway Authority Development and Capacity Framework, which blueprints how such authority may eventually and sustainably take over responsibility for the sector.
- Road sector studies: (i) Road condition surveys of prioritized corridors and connecting roads not selected for support under Components 1 and 2. This may be through a mix of equipment-based, visual and virtual surveying. Approximately 2,500 km will be subject to this activity; (ii) Road safety diagnosis, to map out key stakeholders, institutional ownership and capacities, existing initiatives and support framework to address road safety, as well as conduct a road safety audit on selected primary corridors to identify blackspots, and (iii) Analysis of gender and social inclusion in trade and transport for future investment projects;

[1] While important capacity gaps exist within FMS institutions as well, the project scope is focused on building national level capacity as a first step and aligned with the national level roads prioritized during the project. It is expected that subsequent projects conducting civil works in specific locations will support development of relevant FMS institutions.

- Update and expansion of the National Ports Masterplan to inform a cohesive national development and management of the sector, and preparation of a Somali Port Authority Development and Capacity Framework, which blueprints how such authority may eventually and sustainably take over responsibility for the sector.

Trade Facilitation

- Series of trade facilitation actions, including design of a national transit regime and guarantee system for a facilitated movement of trucks across FMS and the design and pilot-implementation of a cargo tracking system to improve security, efficiency and revenue collection for long-distance transport operations.
- Support to investment strategies for and capacity development of Small and Medium Enterprises in responding to development of regional corridors.

Integrated Economic Corridor Planning

- Support for the development of an integrated national investment strategy identifying key priority economic activities and investments for the development of the economic corridors in a coordinated way; policies necessary to oversee and implement such a strategy; and harmonization of sectoral data and strategies into an interactive platform reflecting dynamically sector priority investments, aggregating datasets relevant to all sectors (a national Atlas) and providing a monitoring tool for sectors respective developments;
- Support for the digital development sector as it relates to planning and implementing fiber optic deployment along targeted corridors, such as a feasibility study for a national fiberoptic backbone.
- Fisheries activities to support trade along the selected corridors, identifying concurrent investments and improving planning for fisheries development.
- Energy sector planning studies are necessary to align infrastructure development along economic corridors developments.

Environmental and Social Risk Management

- Undertaking of a focused capacity needs assessment with a costed training plan, building basic understanding of social and environmental risk management, establishment of procedures and templates for risk management, conducting regional and national training workshops, coordination and cooperation with other development partners, and a draft road map for the FGS and the associated FMS for establishing and enhancing own country environmental and social risk management system.
- Security Risk Management

Component 4: Project Management

19. This component will finance overall project implementation, coordination and management costs of the project, including costs associated with a Project Coordination Unit (PCU) in the MPWRH[2]. The project will rely as much as possible on local staff, utilizing external technical assistance consultants to support but not taking responsibility for deliverables. This Component will finance the following activities.

- PCU staff salaries and associated costs
- Incremental costs in setting up PCU offices, including equipment
- PCU operating costs
- TA to the PCU

[2] On occasions, TA may on interim basis be provided directly to beneficiary ministries.

- Ad-hoc or intermittent support to beneficiary ministries to discharge their technical responsibilities
- Project audits.

Component 5: Contingent Emergency Response

20. The contingent emergency response component (CERC) is included under the project in accordance with the World Bank Policy on Investment Project Financing dated November 10, 2017, Paragraph 12 and 13 for situations of urgent need of assistance, as a project specific CERC. This will allow for rapid reallocation of project funds in the event of a natural or man-made crisis in the future, during the implementation of the project, to address eligible emergency needs under the conditions established in its operations manual. This component will have no funding allocation initially and will draw resources from the other expenditure categories at the time of activation. If an Immediate Response Mechanism (IRM) is established, this component will serve as an IRM CERC to allow the reallocation of uncommitted funds from the project portfolio to the IRM Designated Account (DA) to address emergency response and recovery costs, if approved by the World Bank.

Chapter 3 – Policy, Legal, Regulatory and Institutional Framework

3.1. Overview

21. This chapter focuses on the relevant provisions of key Somali policy, legal, regulatory and institutional framework, which are related to the activities to be carried out under this project. It also presents relevant international conventions and treaties, which the FGS has signed or ratified. Additionally, this chapter includes other ESF provisions as required by the World Bank and associated Environmental Health and Safety (EHS) Guidelines including Good International Industrial Practices (GIIP) to which the borrower is obliged to and analyzes key legislative gaps between both frameworks of the FGS and World Bank in relation to E&S assessment and management.

3.2. Summary of National Legal Framework

22. The Federal Republic of Somalia's Provisional Constitution and relevant national policies provide a strong legal foundation for environmental and social safeguards in line with international standards. Key provisions include:

- Human Rights and Equality (Arts. 10–15): Protection of dignity, prohibition of discrimination, equal access to justice and freedom from harmful practices including FGM and forced labor.
- Labor and OHS Standards (Arts. 24, 42, Labor Code): Right to fair labor conditions, workplace protections especially for women and youth, and emerging occupational health and safety (OHS) regulations in revised labor laws.
- Environmental Protection (Arts. 25, 43–45): Rights to a healthy environment, sustainable use of resources, and duties on both citizens and the State to protect the ecosystem. The National Environment Policy and the draft ESIA regulations support this framework.
- Access to Information and Justice (Arts. 26, 32, 111J): Constitutional rights to property and information, with redress mechanisms via the Office of the Ombudsman.
- Natural Resource Governance (Art. 43, 111H): Land use, climate change, and biodiversity conservation policies integrated into national development and security strategies.
- Gender and Vulnerable Groups (Art. 11, National Gender Policy): Affirmative protections and legal reforms addressing gender-based violence (GBV), child marriage, and labor equity.

This framework is reinforced by sectoral policies (e.g., WASH, fisheries, energy, forest management) and draft regulations (e.g., Waste Management, ESIA Regulations 2021) currently under development or adoption.

This summary is based on the full legal and policy context presented in Annex 2 – Somalia's National Legal and Policy Framework Relevant to Environmental and Social Safeguards.

3.3. Institutional Framework Relevant to the Project

Environmental Management

23. The Somalia Federal Government has introduced changes in the institutional set-up dealing with environmental issues in the country. The Ministry of Environment and Climate Change is mandated to draft the national environmental policies, regulations and legislations including establishing the Environmental Quality Standards (EQS), Sectoral Environmental Assessments (SEAs), Environment Impact Assessments (EIAs) and Environmental Audits (EAs), among others. However, necessary laws or legislation have not yet been formulated, and no commissions or authorities have been established (as of March 2020).

24. The DoE, part of the OPM, takes the lead in the formulation of environmental policies and laws, coordinates stakeholder consultations and partnerships with state agencies, local councils, civil society and private sector entities.[3] The Directorate is also the operational focal point for

[3] Somalia State of the Environment Report, 2019.

multilateral environmental agreements and funds, such as the GEF, GCF etc. It is also tasked with conducting SEAs, EIAs and EAs, including social aspects thereof. In addition, the Ministry of Environmental has also published draft ESIA[4] regulations.

25. The South-West and Jubbaland States have within the government echelons the Ministry of Environment and Tourism (MoE&T), which manages environmental related issues within the state. The MoE&T has developed and passed ESIA regulations, which are meant to govern environmental matters, including licensing of landfills, waste pits and medical waste incinerators, in addition to oversight over environmental governance.
26. Respective state ministries, including Hirshabele and Galmudug, in charge of environment and health are the principal institutions to be consulted before, during and after the implementation of all interventions under the project, in so far as they relate to possible environmental and social risks and impacts. These ministries are mandated to supervise, and co-ordinate all matters relating to the environment (incl. social) and health. These two states are recently established FMSs compared to the earlier ones like Puntland and Somaliland, where there is now advancement in institutional and legal framework. Therefore, the respective policy, legislative and institutional frameworks for these states couldn't be confirmed for the purpose of inclusion in this ESMF.
27. Puntland. The Ministry of Environment, Agriculture and Climate Change (MoEACC) deals with management of environment and natural resources. The ministry collaborates with the Humanitarian Affairs and Disaster Management Agency (HADMA) in the development of climate change, early warning and drought resilience strategies. It also collaborates in the identification and mapping of Puntland disaster prone zones.
28. The MoAECC has responsibility for climate change mitigation and adaptation strategies and has a five–year plan (2017-2021). The HADMA is not directly involved in environment-related activities, but has a key role in disaster preparedness, management and mitigation. The Ministry of Planning and International Cooperation (MoPIC) has a three-year development plan (2017-2019) covering livestock, agriculture, social services and the environment. The plan was approved in 2016 by the Puntland Cabinet and is being supported by the UNDP Somali Project Watch Brief.
29. Benadir Regional Administration (BRA) is a local government entity, established in law and enshrined in clause 1(b) of article 48 of the Constitution of the Federal Republic of Somalia, which relates to the structure of the state. Benadir is one of the 18 administrative divisions of Somalia established at independence in 1960. Benadir itself is comprised of 17 administrative districts that make up the city of Mogadishu, which is also capital of the federal republic. The BRA bears the dual responsibility of managing the affairs of the region as well as the municipality of Mogadishu. Thus, its administrative head is also the governor of the region as well as mayor of the city. Law Number 6 relates to local government and its older version, Law 19, clearly defines the mandates to provide basic services to the city of Mogadishu, including road services.
30. Somaliland. The Somaliland constitution, and specifically Article 18 ("The Environment and the Relief of Disaster") prescribes that the state [of Somaliland] 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, damage to the environment shall be determined by law. The organic law for environmental risks management in Somaliland is via Xeerka Maareynta Deeganka (Environmental Management Act), promulgated in September 2018 as Law No. 79/2018 and officially published via the national gazette in Somali. Other environmental laws in Somaliland include the National Environment Research and Disaster-preparedness (NERAD) Agency Law – Law No: 35 of 2006 (passed by both Houses in 2007), Law on the Prevention of Deforestation & Desertification (Law N: 04/1998), Ministerial

[4] ESIA and EIA terms can be used interchangeably meaning both environmental and social aspects

Programme on marine reserves and conservation April 2004, and the Wildlife & Forest Conservation Act.

31. Management of environmental affairs in Somaliland is institutionally under the Ministry of Environment and Rural Development. This ministry consists of eight departments: Department of Rural Development, ICT Department, Human Resource Department, Environmental Safeguard Department, Finance and Administration Department, Planning Department, Rangeland and Forestry Department, and Wildlife and Parks Department.

Labor Management

32. The Federal Ministry of Labor and Social Affairs (MOLSA) is responsible for labor policy and regulatory frameworks. The Labor Ministry in each State is in charge of implementing the labor code, including labor inspection. While five States have labor ministries, only Puntland has three Labor Inspectors under the Minister. The others have no functioning labor inspection. The Revised Draft Somalia Labor Code (which is awaiting cabinet approval) has more emphasis on OHS requirements. It makes the Director of Occupational Safety and Health (DOSH) responsible for the registration of hazards and risks, regulation and supervision of all workplaces and monitoring or enforcing compliance with Labor Code and any other Labor laws to the extent that they regulate safety, health and welfare in the workplaces. Part VI of the Revised Draft Labor Code covers the administration of occupational accidents, injury and disease provisions at workplace, employer's general duties towards OHS, insurance requirements, employees' general duties, medical support, compensation, offenses and penalties, etc. The Labor Code covers protection against risks to the workers, notification procedures in occupational accidents, medical requirements at site and conveyance of injured workers to the hospitals, among others.

Management of Issues related to Gender and Inclusion

33. The Ministry of Women and Human Rights Development is mandated to advance the promotion and protection of gender equality and human rights, including the rights of women, children and inclusion of other vulnerable groups. The Ministry works closely with UN agencies (UNDP, UNICEF, WHO among others) and Civil Society Organizations (CSOs) to deliver its commitments on management of issues related to gender and inclusion and human rights. It is notable that the FGS and FMS are still developing systems to manage gender issues.[5]

3.4. Summary: International Environmental and Social Frameworks

34. The Federal Government of Somalia is a signatory to several key international treaties and labor standards relevant to environmental and social safeguards. These include the Basel Convention and Stockholm Convention, which regulate hazardous waste and persistent organic pollutants respectively. Somalia is also a party to core International Labour Organization (ILO) conventions that uphold labor rights, including those related to occupational safety, non-discrimination, child labor, and fair wages.

35. In addition, the World Bank Environmental and Social Framework (ESF, 2018) applies to the SHIIP Project, setting out ten Environmental and Social Standards (ESSs) that guide project implementation. These standards ensure robust assessment and management of E&S risks (ESS1), promote fair labor conditions (ESS2), support pollution prevention and efficient resource use (ESS3), and address community health and safety (ESS4), among others. ESS10 also ensures inclusive stakeholder engagement and access to grievance redress.

Furthermore, the World Bank's OP 7.50 on international waterways applies to port-related feasibility studies, given the project's interface with the Gulf of Aden. Annex 3.

[5] UNDP 2018.

3.5. World Bank Group EHS Guidelines – WBG EHSGs

36. The WBG has guidelines for Environment, Health and Safety (EHSGs)[6] that serve as useful references for general issues as well as sector-specific activities. Projects financed by the WBG are expected to comply with these guidelines as required by the policies and the standards. The EHSGs are mainly on OHS, community health and safety as well as on construction and decommissioning. It contains guidelines crosscutting on environment (waste management, ambient air quality, noise and water pollution), OHS issues among others, applicable to all the industry sectors. Most importantly, the WBG has provided a dedicated EHSGs for Toll Roads, which include information relevant to construction, operation and maintenance of large, sealed road projects including associated bridges and overpasses. Issues associated with the construction and operation of maintenance facilities can still be addressed in the General EHSGs. Issues associated with sourcing of construction materials are presented in the EHSGs for Construction Materials Extraction, while those related to vehicle service areas are included in the EHSGs for Retail Petroleum. This Project will comply with the World Bank's General EHSGs where civil work is taking place, as well as other EHSGs, where deemed applicable.

3.6. Gap Analysis

37. The Activities and Interventions planned under this Project, including their respective sub-project activities, will need to comply with both existing Somali laws and regulations, and WB ESSs. This sub-section compares the national-level public sector environmental governance and social management rules, regulations and standards to World Bank's Standards. The main objective of this assessment is to help implement this ESMF more effectively at the Federal and State levels in Somalia through an understanding of existing gaps. Table 2 summarizes a comparison focusing on the WB ESF relevant to the project and gaps identified in existing Somali laws and regulations.

[6] https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/policies-standards/ehs-guidelines

Table 2: Gap analysis and gap-filling measures

Scope	World Bank E&S Standards (ESSs)	Government of Somalia policies, regulations	Gaps identified	Gap-filling measures
ESS1 ("Assessment and Management of Environmental and Social Risks and Impacts")				
EIA instruments	The range of instruments to satisfy the Bank include EIAs, regional or sectoral EAs, EMP, etc.	Instruments for environmental assessment have not been delineated at Federal level, and are absent in Jubbaland, Galmudug, Hirshabelle and South-West State	EIAs are not incorporated into Federal laws and are weakly captured at State level in only Puntland. Missing in South-West State, Galmudug, Hirshabelle and Jubbaland	ESMF to guide the borrower. ESMPs to be derived from ESMF and made site-specific to the proposed sub-projects.
Environmental impact screening	Screening procedures developed for projects involving sub-projects, as is the case in SHIIP	Not uniformly addressed	Screening procedures are absent in States (South-West State, Galmudug, Hirshabelle and Jubbaland)	ESMF to guide the borrower.
Public consultations	The Bank requires the Borrower to initiate consultations with project-affected persons and other interested parties including civil society	Procedures for public consultations not explicitly stated	Procedures for public consultations not explicitly stated	SEP to guide the borrower.
Monitoring environmental data	Bank requires regular monitoring of environmental data to evaluate the success of mitigation and to foster corrective measures at the earliest possible juncture	There are no procedures provided in regulations in the country on the conduct of monitoring activities in the collection of environmental data	There are no procedures provided in regulations in the country on the conduct of monitoring activities in the collection of environmental data	ESMF to guide the borrower.
Institutional arrangement	Requirement by the Bank for specific description of institutional arrangement and implementation schedule for monitoring and mitigation measures	Directorate of the Environment in the Office of the Prime Minister Benadir Regional Administration, as well as relevant line ministries in Puntland, Galmudug,	Directorate of the Environment in the Office of the Prime Minister may be responsible for coordinating institutional responses under this ESMF, but the institutional information is	Respective PCUs to work with the respective ministries and agencies responsible for management of environmental matters as the focal points for administration of this ESMF.

Scope	World Bank E&S Standards (ESSs)	Government of Somalia policies, regulations	Gaps identified	Gap-filling measures
		Hirshabelle, Jubbaland, and South-West states.	not available, and its remit is unknown, as is its technical capacities.	
ESS2 ("Labor and Working Conditions")				
Management of different types of project workers	The Bank places particular emphasis on the identification and characterization of all categories of workers—project workers, direct workers, contracted workers, community workers, and primary supply workers—to ensure tailored risk management. In addition, the Framework incorporates robust workforce protection measures, including prohibitions on child labor, adherence to national minimum-wage and working-hours requirements, and respect for freedom of association and non-discrimination. A formal grievance mechanism is established to receive, investigate, and resolve worker and community complaints, and comprehensive Occupational Health and Safety (OHS) standards are applied to prevent workplace hazards, promote safe working conditions, and	Labor Code of Somalia (Law Number 65, adopted in 1972) is the specific labor law governing all aspects of labor and working conditions, which covers the contract of employment, terms and condition, remuneration, and occupational health and safety, trade unions and labor authorities. The provisions of the Labor Code apply to all employers and employees in all project municipalities. The Labor Code is applicable to all project workers of SHIIP.	The Labor Code is broadly consistent with the ESS2, while there is a significant gap in the enforcement aspect of the legislation. More details are presented in the Project's LMP.	ESMF and the Labor Management Procedures (LMP) to guide the borrower.

Scope	World Bank E&S Standards (ESSs)	Government of Somalia policies, regulations	Gaps identified	Gap-filling measures
	ensure ongoing monitoring and reporting.			
ESS3 ("Resource Efficiency and Pollution Prevention and Management")				
Pollution prevention and management	This ESS requires the Borrower to avoid or minimize pollution through appropriate prevention and control measures. Where there is historical pollution that poses a significant risk to human health, the Borrower is required to undertake a health and safety risk assessment to identify and manage those risks to communities, workers, and the environment.	Not addressed.	There are no supporting legislative frameworks for pollution prevention and management.	ESMF to guide the borrower on pollution prevention and management.
Management of hazardous wastes	The bank requires the Borrower to undertake specific measures to manage both hazardous and non-hazardous wastes. Specific emphasis is given in this ESS with respect to transportation and disposal, obtain chain of custody documentation to the final destination. Approved disposal sites are required for this ESS.	Not addressed.	There are no approved hazardous waste disposal sites in Somalia.	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
ESS4 ("Community Health and Safety")				
Traffic and road safety covers: Design and safety of infrastructure Pollution prevention and environmental buffers Land-use change impacts Operational traffic safety measures	This ESS 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.	Not addressed.	No provisions in existing national laws on road and traffic safety.	ESMF to guide the borrower on road traffic safety.
Security personnel	This ESS postulates that when the Borrower retains security personnel to safeguard workers and property, it will assess risks posed by these security arrangements to those within and outside the project site. 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.	District police are expected to provide security services to SHIIP. The civil servants in Somalia are governed by Provisional Constitutions and Civil Service Law (Law Number 11). The Somali National Police Force are the primary official 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.	While the quality of security services provided by the police needs to be confirmed in each region/ district, the project will coordinate with the law enforcement authorities in each region/ district to manage associate risks.	The Project to be guided by relevant provisions of ESS4 on the deployment of security personnel to project sites. In addition, the respective PCUs will follow the requirements for deployment of security personnel in Project's sites in line with the Good Practice Note on "Assessing and Managing the Risks and Impacts of the Use of Security Personnel. Security assessments and plans will be done at district level, where possible.[7]
ESS5 ("Land Acquisition, Restrictions on Land Use and Involuntary Resettlement")				

[7] 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
Physical and economic displacement	This ESS 5 covers project-related land acquisition and restrictions on land use resulting in loss of shelter or loss of assets: a hierarchy has been provided that seeks to minimize losses to affected persons. It forbids forced evictions.	Laws governing land resources (including ownership) are either absent at both FGS and FMS levels.	Therefore, there are no functional national or state policies guiding involuntary resettlement of persons affected by the Project. More details will be presented in Project's Resettlement Policy Framework (RPF).	RPF to guide the borrower.
ESS8 ("Cultural Heritage")				
Management of risks on tangible and intangible cultural heritage, including legal protection to cultural heritage sites	This ESS 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.	Not addressed.	There are no explicit laws or regulations delineating sites as places of cultural importance.	ESMF to guide the borrower.
ESS 10 (Stakeholder Engagement and Information Disclosure)				
Engaging key stakeholders and publicly disclosing project information	ESS 10 requires Borrowers to meaningfully engage with stakeholders throughout the project life cycle. This ESS requires Borrowers to provide stakeholders with timely, relevant, understandable and accessible information.	Not addressed in national legislation.	There are no laws, policies, or regulations prescribing the need for stakeholder engagement and information disclosure.	SEP to guide the borrower.

38. In light of the above gaps, combined with lack of enforcement of local laws and regulations in general, the WB-financed Somalia Infrastructure Integration Project will aim to achieve and implement whichever is more stringent. Therefore, the Project will adhere to relevant WB's ESF requirements and provisions, as well as WBG's EHS Guidelines both General and Industry-specific. This will be achieved in appropriate liaison with the national and state teams, so that E&S impacts are adequately assessed, mitigated, managed, monitored, and reported upon, through the Project life cycle. Consequently, all E&S safeguard instruments will be developed and cleared before the start of implementation, including developing site-specific instruments prior to commencement of any local activities.

Chapter 4 – Environmental and Social Baseline

39. This chapter provides a focused summary of environmental and social baseline conditions directly relevant to the proposed SHIIP project corridors across Somalia's Federal Member States. Given the nature of SHIIP as a technical assistance operation preparing investments in transport and infrastructure sectors, this baseline emphasizes geographic, ecological, and administrative characteristics in locations where secondary and tertiary road corridors are proposed.

40. Somalia's geography is characterized by arid to semi-arid climate, seasonal rivers (Juba and Shabelle), low rainfall, and fragile ecosystems — especially in coastal and central regions. The project corridors pass through various ecological zones, including grasslands, scrublands, and seasonal riverine environments, some of which are sensitive to soil erosion and desertification. Environmental vulnerabilities include overgrazing, poor water resource management, and deforestation (notably charcoal production). Socially, many regions are pastoralist or agro-pastoralist with limited infrastructure, weak public service delivery, and high poverty rates.

The project spans across seven FMS, each with distinct baseline considerations:

Table 3:Somalia's Economic Corridors & Connectivity Roads

Location	From	To	KM (Type)
JUBA-LAND STATE	Kismayo	BIBI - Barka	110 (Economic Corridor)
	Kismayo	Bula xaji	80 (Connectivity Road)
	Dhobley	Dusmo	50 (Connectivity Road)
			Total: 240 KM
SOUTHWEST STATE	Afgoye	Barawe	180 (Economic Corridor)
	Kuntuwarey	Main Rd	73 (Connectivity Road)
	Qoryoley	Main Rd	25 (Connectivity Road)
	Marko	Main Rd	30 (Connectivity Road)
			Total: 308 KM
HIRSHABELLE STATE	Bulaburte	Baladweyne	120 (Economic Corridor)
	Cadale	Mahadaay	100 (Connectivity Road)
	Abooreey	Bera Yabal	30 (Connectivity Road)
			Total: 250 KM
Galmudug State	Qaradhi	Galkayo	140 (Economic Corridor)
	Baxdo	Cadaado	90 (Connectivity Road)
	Cadaado	Caabudwaq	50 (Connectivity Road)
			Total: 280 KM
Puntland State	Galkacayo	Galdogob	65 (Economic Corridor)
	Isku shubn	kalabaydhka	130 (Connectivity Road)
			Total: 195 KM (Approved)
SSC	Tuulo samakaab	Buuhoodle	110 (Connectivity Road)
			Total: 110 KM
Somaliland	Halaya	Ina Guha	90 (Economic Corridor)
	Balimatan	Qolcaday	60 (Connectivity Road)
	Garbo-dadar	Borama	64 (Connectivity Road)
			Total: 214 KM

4.1 Location and Administration

41. The Federal Republic of Somalia is a country located in the Horn of Africa. It is bordered by Ethiopia to the West, Djibouti to the Northwest, the Gulf of Aden to the North, and Kenya to the Southwest (as shown in Figure 1). The country occupies a land area of 627,337 km^2 and its terrain mainly consists of plateaus, plains, and highlands. Its coastline is more than 3,333 km in length, the longest of mainland Africa. Only 1.8 percent of the land is arable whereas permanent pastures and forests constitute 68.5 percent and 10.6 percent of the area, respectively.

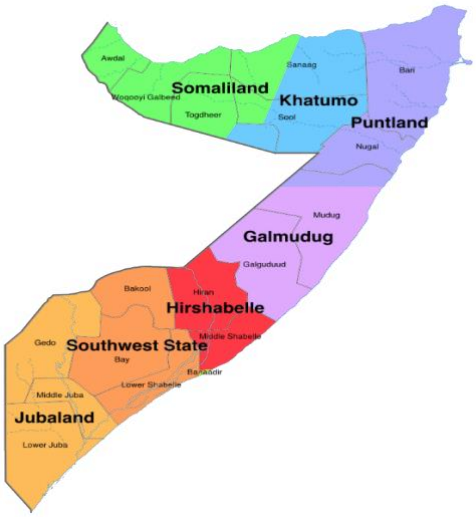

Figure 1: Map of Somalia's states and regions

42. Following the outbreak of the civil war and the ensuing collapse of the former government in the early 1990s, Somalia's residents reverted to local forms of conflict resolution, consisting of civil law, religious law and customary law. The early 2000s saw the creation of the Transitional National Government (TNG), followed by the formation of its successor, the Transitional Federal Government (TFG) in 2004, which re-established national institutions. The TFG was the internationally recognized government of Somalia until 20 August 2012, when its tenure officially ended. The Federal Government of Somalia (FGS) was established in September 2012 and was unanimously recognized by the international community. Administratively, Somalia is divided into Federal Member States (Galmudug, Hirshabelle, Jubbaland, South-West and Puntland), Benadir Administration and Somaliland. All the authorities are governed by their own elected governments which are independent in managing their own resources as well as the resources allocated to them. The transport system in all Somalia is also organized around the same administrative hierarchy. The figure above show the administrative divisions in Somalia.

4.2 Physical and Natural Environment

43. Somalia has a tropical hot and arid climate, with little seasonal variation and daily temperatures that vary from 30°C to 40°C. The country experiences low annual rainfall and four seasons: *Gu'* and *Deyr* are the rainy seasons, while *Haga* and *Jilal* are the dry seasons. There are variations in spatial distributions of rainfall, with about 500 mm recorded annually in the northern highlands and between 300 and 500 mm in the southern regions. The coastal plains register only between 50 and 150 mm. Over the years, however, changing and unpredictable climate patterns have resulted in recurrent floods and droughts, experienced across the country. Annual Potential Evapotranspiration (PET) is high, exceeding 2,000 mm in the northern basins and can be as high as 3,000 mm in the Gulf of Aden. Over the dry period, the vegetation is sustained mainly through the shallow aquifers found along the dry riverbeds (*tog or wadis*) across the country. Fertile

flood plains and continuous recharge from the Juba and Shabelle Rivers, both originating from Ethiopian highlands, also provide sustained development growth along the riverine areas.

44. Somalia's environmental complement, especially the vegetation resources, offers contrasting experiences, due to the spatial and temporal precipitation distributions. There are four main eco-regions in Somalia, whose distribution is determined by the spatial and temporal distribution of the two annual rainfall seasons:

- The dominant xeric grasslands and shrub-lands (accounting for 74% of the country's landmass);
- Somali montane xeric woodlands (14%);
- East African mangroves (11%); and
- Coastal forest mosaic (11%).

45. Farms in the south-central region, urban centers and other settlements account for the remaining 1% of dry landmass.

46. South-West State: This State, which forms part of the larger south-central and southwestern ecosystem of the country, is characterized by large swathes of grasslands, scattered farmlands, and is home to the two main river systems in the country (Jubba and Shebelle). The soils are best described as poorly drained clay soils with high salt content. Well-watered and including the most arable portions of the country, the state is home to rich pasturage and features semiarid savannah grasslands, open woodlands, and thickets that include frequently abundant underlying grasses.

47. Puntland State: Puntland's ecological characteristics are underlined by broken mountain terrain, shallow plateau valleys and usually dry watercourses known locally as the *Ogo*. The region is also characterized by generally high temperatures ranging between 25°C (in the Sool and Sanaag regions) and >35°C in the northern coastal regions (e.g., Bossaso), with the hottest temperatures recorded between July and September. In this region, the arid climate means that all rivers are ephemeral, with water flowing for only a few hours or days after rainfall. There is no river gauging stations in these rivers.

48. The high plateaus of northern Somalia are comprised mainly of low formations of arid scrublands and scattered grass clumps crossed by broad, shallow and generally dry watercourses. These watercourses have water for short periods during rainy seasons and are thus able to provide short-term fodder (usually no more than 5 to 6 months in a year) for transhumant livestock populations.

49. An important ecological feature in Puntland is the long and broad Nugaal Valley, with its network of extensive and intermittent seasonal watercourses that collect runoff from the periodic and erratic low rainfall. There are large herds of small stock (shoats – sheep and goats) belonging to nomadic pastoralists who eke out a living in this marginal land. Productivity in this region is hobbled by not only precipitation challenges but also by the high prevailing temperatures.

50. With increase in elevation and rainfall in the mountain ranges of the north-western Puntland, the vegetation becomes denser and includes aloes, woodlands, and remnants of juniper forests and candelabra euphorbia. The area receives the highest rainfall in the whole of Somalia. The fauna and flora of the habitat are relatively stable due to low human encroachment, thanks to the distant escarpments and plateau areas, though hunting larger animals have reduced their population. Strict endemic reptiles of the area include the *spalerosophis* and *Leptotyphlops* snakes and the *pseuderemias* lizard. The Somali Pigeon and thrush are found in this area. The gazelles are more widely distributed than other mammals but suffer from over-hunting and overgrazing of the livestock.

51. Important to note that in this fragile ecosystem, *Boswellia* and *commiphora* trees are sources, respectively, of frankincense and myrrh, production of which Somalia (and Puntland) has been renowned for since ancient times. However, vegetation in large parts of the northern coastal

plains is denuded: thus, large areas are almost bereft of vegetation even in the best of times, due to inappropriate land uses, including extensive production of unregulated charcoal.

4.3 Socio-economic Environment

52. **Economic outlook**: Somalia reached the Decision Point of the Heavily Indebted Poor Countries (HIPC) initiative on March 25, 2020, restoring the country's access to regular concessional financing and launching the process toward debt relief. It cleared its arrears to the African Development Bank (AfDB), the International Monetary Fund (IMF) and the International Development Association (IDA) and reduced its external debt to $3.9 billion (78% of the revised 2020 gross domestic product (GDP) from $5.3 billion. The economic outlook remains less impressive due to the negative impact of COVID-19 pandemic exacerbated by the invasion of the desert locust and changing climate conditions. These factors collectively continue to affect the social and environmental conditions of the people. In addition, political disagreements on the management of the elections caused multiple delays in the conclusion of the election process including presidential election. Although the elections are currently being finalized, the standoff had caused a lot of political tension and threatened the nascent constitutional order

53. **Population**: Actual population numbers are difficult to come by, and various estimates are used. Somalia, with a landmass of about 627,340 km^2, has a population estimated to be 15,294,151[8]. The United Nations Population Fund (*formerly the United Nations Fund for Population Activities*) estimated that in 2014[9] the total population of Somalia was 11,800,833, which was broken down to 1,830,073 for Puntland, 508,180 for Somaliland and 6,462,580 for the rest of Somalia. Estimates show that, out of the total population, 4,968,526 people in 2018 are living in urban centers. This accounts for a relatively highly urbanized society (standing at ~33 percent), when compared to its contemporaries in Africa, including Eritrea (24 percent), Niger (17 percent) and Burundi (21 percent).[10] However, as in much of Africa, urbanization in Somalia has largely resulted in rising slum establishments, increasing poverty and inequality. The population density in Somalia is estimated at 24 persons per km^2, one of the lowest in East Africa. The median age in Somalia is estimated to be 16.6 years. The population's livelihoods are connected to either livestock husbandry, smallholder dryland agriculture, itinerant commerce or remittances from diaspora. Somalia is reportedly the world's fourth-most remittance dependent country, which makes up about 20-50 percent of local economy.

54. **Household size:** The average household size in Somalia is 6.2 persons, slightly higher than the 5.9 persons per household recorded in the Population Estimation Survey of Somalia (PESS) in 2014 (UNFPA 2014). [11] Urban households, which have 6.6 persons per household, are slightly larger than rural households, with 5.7 persons per household. Nomadic households have the lowest average household size, with 5.3 persons. According to the 2014 PESS, the nomadic and urban households had the highest average household sizes, at 6.5 and 6.4 persons respectively, rural areas had a household size of 5.8 persons. About one-third (32 percent) of households are headed by women (33 percent of urban and 33 percent of rural households, and 28 percent of nomadic households).

55. **Gender:** UNDP Somalia reports that Somalia has one of the highest gender inequalities in the world at 0.776, which ranks fourth in the world [12]. The country has an extremely high maternal mortality, rape, female genital mutilation and child marriage rates, and SEA/GBV against women and girls is common. The participation and roles of women in politics and decision-

[8] 2018 -These estimates are based on information from http://www.worldometers.info/world-population/somalia-population/
[9] UNFPA Population Estimates Survey of Somalia 2014
[10] See "Africa's urbanization dynamics" at this URL: https://www.brookings.edu/blog/africa-in-focus/2020/07/16/figures-of-the-week-africas-urbanization-dynamics/
[11] See "FINAL SHDS Report 2020_V7_0.pdf
[12] See "Funding-for-GEEWG-in-humanitarian-programming-Somalia-en.pdf. and Somali-Labour-Force-survey-2019.pdf

making is minimal, which perpetuates limited female roles and inequality. While in Somaliland and Puntland women's rights are ostensibly protected in their respective constitutions, implementation of these provisions is lagging behind. Women make up 57 percent of the workforce in agriculture and pastoralism (both of which constitute nearly 70 percent of the local economy). The number of women working in government departments and agencies in Somalia is estimated at just 19 percent of the workforce. The situation is also dire in the education sector, where only 36 percent of pupils in the upper primary education are girls. Gender disparity is higher in upper grades due to economic constraints and early marriage.

56. In Somalia, the women are significantly involved in trading and commerce, from micro-enterprises to large-scale businesses. While the women butcher and sell small ruminants (goat and sheep), they however make up most of the fruits and vegetables vendors. The women are also engaged in the sale of local imported goods (e.g., rice, sugar, wheat, sorghum, etc.).

57. The Project is envisaged to make a positive impact for women transhumant nomads and smallholder farmers in terms of increasing access roads to more and better-quality water and agricultural goods marketing and services (extension, improved seeds, quality germplasm, among others). The Project implementing teams will make deliberate efforts to ensure that women and girls are represented in community investment planning and in the governance structures of the road infrastructure constructed under SHIIP. Environmental and social risks mitigation will also ensure women's needs are addressed.

58. **Poverty**: The United Nations classifies Somalia as a least developed country. The socio-economic situation of the country is described as "very poor" in the National Development Plan (2017-2019)[13], with approximately 69 percent of Somalis reportedly living below the poverty line. Poverty cuts across sectors, location, group and gender, and its forms and causes vary. An understanding of Somalia's geography, recent trends in its economy and consequences of the civil strife is important to determining the nature and extent of its poverty. There is more stability in the northern regions (Somaliland and Puntland), and consequently less poverty. Poverty in Somalia is more pronounced in the Internally Displaced People (IDP) camps, where it is estimated to be 88 percent, followed by rural areas with 75 percent and urban areas with 67 percent.

59. Agriculture, livestock and livelihoods: Only about 10 percent of Somalia's land can be described as arable and suitable for crop production. Somalia's agricultural sector, which accounts for 65 percent of the GDP and employs 45 percent of the active workforce (Somalia Agriculture Report, 2018), relies on the state of health of the country's natural capital (vegetation and water resources). It is worth noting that the livestock sub-sector alone accounts for between 80 to 90 percent of agricultural GDP and contributes about US$2.4 billion (or about 40 percent of total GDP) and more than 90 percent of export earnings (ibid) and grows 6 percent annually. According to the Somalia Agriculture Report (2018), total agricultural exports have climbed every year since the late 2000s, to a peak of $634 million in 2015, more than five times the value before the civil war. The Somalia Supply and Market Outlook Assessment report by Famine Early Warning Systems Network (FEWSN) of 2017, identifies the country's four main staple foods as maize, sorghum, rice, and wheat. While maize and sorghum are grown locally, rice and wheat are almost entirely imported.

60. **Education:** More than two decades of conflict have nearly destroyed Somalia's educational system, which is characterized by poor quality, insufficient numbers of qualified teachers, and inadequate resources. The educational deficit in Somalia is one of the most acute in the world. Somalia has one of the lowest primary school enrollment rates in the world. Just 30% of all school-age children have access to learning opportunities, with over 3 million children remaining out of school. Those in South and Central Somalia are affected the worst. Lacking appropriate accessibility infrastructures, including roads and safe transport, has even lowered school enrollment rates. The education sector is mostly dominated by private service providers;

[13] See http://extwprlegs1.fao.org/docs/pdf/som169866.pdf for a copy of the Plan

however, this is gradually changing especially in Mogadishu where public schools are starting to reappear.

61. **Health:** Covid-19 has laid bare the fragility of Somalia's health system. Decades of conflict, poverty-related deprivation and limited state capacity has meant that Somalia is one of the countries least capable of managing this mutually overlapping catastrophe.

62. Nominally regulated by the Ministry of Health, access to health services is very limited in Somalia. There are a few major hospitals in the country which are mainly located in Mogadishu. While Somalia's health system has been slightly progressing over the last 6 years, there has been significant challenges in both the provision of health services and enabling access to the services, including challenges to provisioning of appropriate road infrastructures. The existing health system is essentially privatized, and it is confined to major towns (centralized), leaving the poor majority, in the rural areas, out of affordable health care. Moreover, the national health system is fragmented, and the absence of unified health system governance has affected the capacity of national authorities to regulate the private sector and to partner NGOs to deliver services to remote areas.

63. Consequently, less than 30% of the Somali population have access to health services. The neonatal mortality rate is 40 deaths per 1,000 live births and the under-5 mortality rate is 137 deaths per 1,000 live births. The maternal mortality rate is estimated at 732 per 100,000 live births. The use of family planning remains low, resulting in high fertility rates. The progress, and also the setbacks, of the health sector has been obscured by lack of reliable data at regional and national level. The absence of research institutions and human resources in research are among the obstacles to implementing evidence-based health interventions and the subsequent quality of health policy and practices.

64. **Roads and transport:** "Of the 21,830 km of roads in the country, it is estimated that only 2,860 km are paved (13 percent), 844 km (3.9%) are gravel, and 18,229 km (83.5%) are earthen dirt roads. Most of the country's roads are in poor condition and usually impassable when it rains. There is minimal engineered storm water drainage infrastructure in urban areas in the absence of which natural streams and rivers act as the main drainage "sinks" with neighborhoods draining into these"[14]. Air transportation is provided by small air charter firms and is popular with the country's small middle class and aid agencies, on account of severe security problems that prevent road transport.

65. **Water and sanitation:** Somalia is mostly arid and semi-arid country that is water scarce. The country has only two permanent rivers, the Juba and Shabelle Rivers, both originating from Ethiopian highlands. Access to improved water supply in Somalia is estimated at 52 percent, while populations with improved sanitation are estimated at a staggering 24 percent, one of the lowest in the world. Limited regulation of private water suppliers often leads to expensive prices, forcing families to fetch water from far and from unsafe open wells. Recurring droughts, now a common natural feature of Somalia, combined with internal displacement and a deteriorated network of water points to compound poor access, forcing supply needs often to be met through emergency operations, such as water trucking.

66. Lack of access to clean and safe water has exacerbated incidences of water-borne diseases especially cholera which is endemic in Somalia. This has contributed to a high under-five child mortality rate of 133 per 1,000 live births. Climate change continues to negatively impact Somalia's ability to achieve food and water security. In rural areas, an inadequate network of pastoral water structures that supply both domestic and livestock water remains the major cause of conflict between pastoralists and settled communities.

67. **Solid waste management:** Solid waste management is very poor across the country. In major towns such as Mogadishu, both public and private waste collection services are provided. In most parts of the country, waste is dumped along the roads, or in water bodies. In Mogadishu, the local government (Benadir Administration) collects, transports, and disposes waste materials

[14] https://documents1.worldbank.org/curated/en/191081576206050578/pdf/Somalia-Second-Urban-Resilience-Project.pdf

from the city, although the percentage of daily waste collected is far less than what is generated. Waste management differs in Somalia's urban areas from that of the rural areas, as there are more people in the rural areas in comparison to the city.

68. **Land tenure:** is a contentious issue in Somalia where land ownership is on clan basis. Somalia is a country of vast rangelands, pockets of cultivated agricultural land, and growing urban areas which are governed by a diverse land tenure regime that suffered significant disruptions during the country's prolonged civil war. Land has been a source of both prosperity and conflict for Somalia. For generations, the region's varied terrain has provided forage for herds, land for crops, and space for commerce. At the same time, uncertainty over land rights has led to violence and contributed to the civil war of the last 20 years.

69. Today, the legal framework for Somalia's land tenure system is a mix of secular, sharia, and customary *xeer* law. This legal pluralism has often provided a flexible structure that local actors have used to craft appropriate solutions, but it has also left grey areas within which conflicts begin. In order to reduce potential clashes and raise incentives to invest in the country's largest economic sector – agriculture – Somalia needs greater transparency and certainty in its land tenure regime.

70. In addition, the current system largely excludes women from control over property, impoverishing them and the society, as a whole. The land tenure system in Somalia is therefore complex and not clear. The Agricultural Land Law of 1975 abolished private ownership and begun embarking on major conversions to leasehold from the state, but the current position in the country is unclear. In urban areas proof of landownership is in many cases hard to verify.

71. **Vulnerable and Disadvantaged Groups:** Somalia's clan system, insecurity, and climate change are some of the main contributors to the ever-increasing number of vulnerable and disadvantaged groups. According to UNHCR report 2023[15], minority groups include *'Bantu'* (*Gosha, Shabelle, Shidle, Boni*) 1 million (15%), *Gaboye* (*'Midgan'*) caste groups (*Tumal, Yibir, Madhigan, other*) 1.5 million (22.5%), *Oromo* 41,600 (0.4%), and *Benadiri Swahili-speakers* (*including Rer Hamar Amarani, Bajuni*) 1.5 million (0.4%). Occupying the south-central portions of the country, *Hawiye* (*part of the Irir clan family*) is probably the largest clan within Somalia, while *Darood* is the largest clan among all Somalis across borders. Since independence *Hawiye* have occupied important administrative positions in the bureaucracy and the top ranks of the army.

72. According to Amnesty International, the Somali minorities comprise principally the "African" *Bantu/Jarir*, who are mostly landless laborers; the *Benadiri/Rer Hamar* urban traders of Middle Eastern origin; and the smaller dispersed *Midgan* (*Gaboye*), *Tumal* and *Yibro* occupational groups of metal-workers, leather-workers, hairdressers, herbalists and others. There are other smaller minorities, such as the *Ashraf* and *Shikhal Muslim* religious communities, *Bajuni* fishing people, and remote hunter-gatherer groups.

73. **Security:** Security and the rule of law are key challenges for Somalia. During the civil war, militia groups and private security companies flourished, while the national security and formal courts system collapsed. Business leaders often financed pragmatic arrangements for basic protection and dispute resolution to enable business to continue. Policing in Somalia, as a source of public order, security, and compliance with the law, is provided by a variety of formal and informal actors. The Somali National Police Force and the National Intelligence and Security Agency are the primary official institutions at the national level that are responsible for providing internal security and public order. Informally, a range of non-state actors, including clan militias and private security groups, provide internal security. Project-specific security risks in each sub-project district will be assessed and mitigation measures considered.

[15] https://webarchive.archive.unhcr.org/20230518092104/https://www.refworld.org/docid/4954ce42c.html

4.4 Cultural Heritage

74. Culture, or "*dhaqan*" in Somali, is a fundamental pillar of the social fabric of Somalis, and has evolved as an amalgamation of traditions developed independently since the proto-Somali era. The culture has also been enriched tremendously through interaction with neighboring and far away civilizations, including other parts of Africa, the Arabian Peninsula, and the Indian subcontinent. However, there has been loss of cultural, tangible and intangible, heritage due to looting and civil conflict. In addition, there has been reported losses of cultural heritage and property due to development projects in Somalia.[16]

75. The implementation of SHIIP and its sub-projects where secondary and tertiary roads are to be selected for rehabilitation; care will be taken not to intersect directly with places of cultural interest. Deliberate efforts to preserve cultural artefacts, cultural heritage and distinct sub-national identities will be maintained. In particular, PCUs should ensure that places of cultural and religious significance such as graveyards of ancient, revered personalities (where this is the case) and mosques are respected and not negatively affected by construction works.

[16] See, for instance, UNESCO's 2013 report on "Scoping study on the culture sector in Somalia", available at http://www.unesco.org/new/fileadmin/MULTIMEDIA/FIELD/Nairobi/images/SOMCLTRPT.pdf

Chapter 5 - Stakeholder Engagement/ Consultation and Disclosure

5.1. Preparatory Meetings

76. The analytical underpinnings of the project are based largely on Somalia's needs. The project has been conceived in light of Somalia's Ninth National Development Plan, which has a special chapter dedicated to the need for investments in the country's economic and social sectors. The design and priorities of the Project have been discussed and refined through a series of engagements between the World Bank and FGS representatives, including a joint planning meeting conducted between the World Bank and the FGS representatives in Mogadishu, Somalia, in February 2020 which involved various stakeholders including line ministries, federal member of states, other ministries and stakeholders from the various economic sectors. This engagement has been further continued through a series of virtual planning meetings throughout 2020 and the first quarter of 2021 with participation from World Bank, MPWRH, Ministry of Finance, and other sectoral stakeholders.

5.2. Stakeholder Engagement and Consultation Moving Forward

77. Given the evolving country context and security-related limitations, early-stage stakeholder consultations were constrained. A detailed record of consultations held in 2021 has been moved to Annex 5 for reference. However, the Project recognizes that sustained and adaptive stakeholder engagement is critical throughout implementation.

In line with the Stakeholder Engagement Plan (SEP) and the World Bank's Environmental and Social Standard (ESS10), the SHIIP Project will implement the following measures to ensure meaningful, inclusive, and continuous engagement during project implementation:

78. Strategic Consultation Planning: Engagement activities will be aligned with key phases of subproject preparation and implementation, and tailored to the specific risks, impacts, and geographic contexts. Special attention will be given to engaging women, vulnerable and marginalized groups, internally displaced persons (IDPs), and communities in fragile or hard-to-reach areas.

79. Modalities of Engagement: Where in-person meetings are not feasible due to logistical, cultural, or security challenges, alternative methods will be employed—including local radio broadcasts, mobile phone surveys, telephone consultations, and collaboration with community-based organizations and local authorities.

80. Roles and Responsibilities: The Project Coordination Unit (PCU), in collaboration with Federal Member States (FMS) and contracted consultants, will lead the planning and implementation of engagement activities. Local focal points and social officers will support continuous dialogue and feedback mechanisms.

81. Grievance Redress Mechanism (GRM): A functional and accessible GRM will be implemented, as outlined in the SEP, enabling stakeholders to submit complaints or suggestions through multiple channels. All grievances will be documented, tracked, and addressed transparently.

82. Monitoring and Reporting: The PCU will monitor stakeholder engagement activities and report on progress through quarterly E&S monitoring reports. Lessons learned will inform revisions to the SEP and strengthen responsiveness to stakeholder feedback.

83. These forward-looking measures underscore that stakeholder engagement is not a one-time activity but a continuous, iterative process—key to ensuring social accountability, enhancing project outcomes, and building trust among affected and interested parties.

5.3. Inclusion Plan for Vulnerable and Marginalized Groups

A. Introduction

84. The project will give special consideration to disadvantaged groups, which include minority castes and groups;[17] IDPs; people who live in remote rural areas or areas characterized by violence that are bereft of social services and amenities; nomadic pastoralist communities; PWDs, women and female headed households including vulnerable orphans and unaccompanied minors.

85. The Contractors' E&S assessment and management plans will identify and address barriers to disadvantaged and vulnerable groups participating in and benefiting from project services. Measures will be included in the contractors' SEPs and community outreach strategies as well as via training of service providers and project staff on the need to promote inclusion and diversity in staffing. Physical measures, such as ramps and rails in fisheries facilities such as markets will be considered as well as means of ensuring that information is presented in accessible formats including sign language and braille. The project will ensure access to separate and culturally appropriate sanitary facilities for males and females, particularly for GBV/SEAH and child spacing services.

86. There are social, economic, and physical barriers that prevent disadvantaged and vulnerable individuals and groups from participating in projects, which include lack of financial resources, inaccessibility of meeting venues, social stigma, lack of awareness and/or poor consultation. For instance, PWDs are often not effectively engaged in consultations due to lack of access, social stigma and cultural beliefs that ensure they not prioritized in health service delivery due to their limited productivity in society. Women with disabilities, for instance, have continued to have less access to child spacing services due to stigma, limited access, and poor perception of service providers about their sexuality. In this regard, the project will deploy viable strategies to engage targeted communities and other stakeholders to overcome social stigma and promote inclusion.

87. In view of the risk of clannism, nepotism and elite capture and potential exclusion of disadvantaged and vulnerable groups, the social team at the FGS and FMS will ensure that the implementing partners put measures in place to reach areas where disadvantaged and vulnerable groups live. They will also promote inclusion in project consultations and access to services. There will be a need to be deliberate in ensuring that men are involved in consultations and all the other aspects related to access to health service access.

B. Engaging disadvantaged and vulnerable groups

88. The project will promote the inclusion of disadvantaged and vulnerable groups by ensuring their involvement in consultations in the sub-project design and the development of the ESMPs. This will include ensuring that health facilities are accessible to people with physical disabilities (e.g. having ramps and rails where appropriate) and training health staff and community health committees on their role in providing services without discrimination. The health facilities will also record PWDs in the health information tools and share the reports with the PCU for monitoring and response where necessary. In addition, efforts will be made to promote diversity in staffing (see LMP). In addition, community health committees will have diverse representations including disadvantaged and vulnerable individuals and groups.

89. Community and project staff training will emphasize non-discrimination and access to fisheries facilities for all disadvantaged and vulnerable groups. A special effort will be made to ensure that staff are trained and sensitized on the inclusion of disadvantaged and vulnerable groups including minorities and PWDs as well as age and associated needs. CoCs, ethical guidelines and procedures for health staff will be established to support safe and appropriate provision of

[17]This shall include all groups falling outside the big four clans and not genealogically associated with them in a specific district or geographical area including the ethnic, occupational groups.

healthcare including the right to impartial needs-based healthcare, and procedures for obtaining informed consent for services. In addition, project and contractor staff will be made aware of the increased risk of sexual violence faced by people with disabilities (women and girls, but also boys and men) and train them in the safe identification and care of PWDs who have experienced sexual violence, while respecting confidentiality. Social barriers affecting access to information and services for these groups, such as discrimination and stigma, will be identified and addressed.

90. Stakeholder and community engagement will be key in the sensitization of community level structures and means by which complaints and grievances related to the project will be received, handled, and addressed. The understanding is that communities understand their own vulnerabilities compared to external actors and the engagement of local structures is most effective in such projects where administrative capacity is limited.

91. The participation of disadvantaged and vulnerable groups in the selection, design and implementation of project activities will largely determine the success of this Inclusion Plan. Where adverse impacts are likely, the PCU and the State-based PIUs will undertake prior and informed consultations with the likely affected communities and those who work with and/or are knowledgeable of the 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.

92. Consultations will be carried out broadly in two stages. First, prior to the commencement of any project activity, the implementing agency will arrange for consultations with community leaders, community health committees and representatives of disadvantaged and vulnerable groups about the need for, and the probable positive and negative impacts associated with the project activities as part of the development of the ESMPs. Second, there will be continuous stakeholder engagement that will ensure the active involvement of disadvantaged and vulnerable groups as part of the contractors' SEP and monitoring.

The implementation entity will:

a) Facilitate broad participation of disadvantaged and vulnerable individuals and groups including women with adequate gender and generational representation, community elders/leaders, religious leaders, and CBOs.
b) Provide the disadvantaged and vulnerable individuals, women and groups with all relevant information about the project including on potential adverse impacts.
c) Ensure communication methods are appropriate given the low level of literacy, local dialects and communication challenges for PWDs.
d) Organize and conduct the consultations in forms that ensure free expression of their views and preferences. Including holding women-specific meetings.
e) Document details of all consultation meetings with disadvantaged and vulnerable individuals and groups on their perceptions of project activities and the associated impacts, especially the adverse ones.
f) Share any input/feedback offered by the target populations; and
g) Provide an account of the conditions agreed with the people consulted.

93. Once the disadvantaged and vulnerable individuals and groups are identified in the project area, the provisions in this Inclusion Plan will ensure mitigation measures of any adverse impacts of the project are implemented in a timely manner. The project should ensure benefits to the disadvantaged and vulnerable by ascertaining that they are consulted, have accessible and trusted GM to channel the complaints they might have on the project.

94. To help ensure that the process does not marginalize men, women and other vulnerable groups, representation for these groups will be required in the grievance committee (GC) tasked to resolve grievances/complaints at the community level.

The following issues will be addressed during the implementation stage of the project:

a) Provision of an effective mechanism for monitoring implementation of the Inclusion Plan by the PCU and PIUs, social risk management team and contracted NGOs;
b) Involve suitably experienced CBOs/NGOs to address the disadvantaged and vulnerable groups through developing and implementing targeted action plans that are issue focused (e.g. on access to health services for women in remote areas);
c) Ensuring appropriate budgetary allocation of resources for the contractors' Inclusion Plans as part of the contractors' ESMPs; and
d) Provision of technical assistance for sustaining the activities addressing the needs of the disadvantaged and vulnerable individuals and groups.

Chapter 6 – Potential E&S Risks and Impacts and Proposed Mitigation Measures

6.1. Overview

95. This section aims to describe, in general terms, the potential E&S risks and impacts of the activities and interventions proposed under SHIIP. This ESMF will constitute a cornerstone document for the development and elaboration of a more focused set of E&S safeguard instruments, before, or at the early commencement of implementation, after intervention locations have been identified. This will include the development of site-specific E&S Screening Checklists (see Annex 6), or ESMPs (see Annex 7 for template ESMP), including Site-specific E&S Assessments proportionate to the scale of intended sub-projects, all in compliance with the requirements of WB ESS1. Resource efficiency & GHG avoidance: Embedding a structured procedure—covering baseline audits, quantitative efficiency targets, best-available technologies, successor-project requirements, and ongoing monitoring—to ensure that both current subprojects and any follow-on initiatives continually improve resource use and minimize greenhouse-gas emissions- Assessment and Management of E&S Risks and Impacts. Environmental and social risks rating for the project are both 'High.'

6.2. Potential E&S Risks and Impact

Key risks and impacts on the physical and biological environment

96. Somalia's physical and biological environment includes arid and semi-arid ecosystems, seasonal wetlands (toggas), critical grazing lands, and drought-resilient biodiversity. Infrastructure development in these fragile areas—such as roads, port infrastructure, and transmission lines—can result in irreversible land transformation, habitat fragmentation, and increased human encroachment.

97. Several of the future sub-projects may be sited near sensitive ecological zones, including migratory routes for wildlife and pastoral corridors, where development could disrupt seasonal grazing patterns and critical water access points. The high dependence on natural resources such as sand, gravel, and water in a resource-constrained setting amplifies the risk of ecosystem degradation.

98. Road development may increase poaching and illegal resource extraction in newly accessible zones. Dust, noise, and pollution from civil works and heavy machinery use will affect both terrestrial and aquatic environments. Furthermore, cumulative impacts from multiple infrastructure projects (e.g., port, roads, digital infrastructure) could surpass ecological thresholds in fragile rangelands and flood-prone zones. These impacts warrant early screening, site-specific ecological assessments, and stringent mitigation aligned with ESS1, ESS3, and ESS6.

99. Reference to ESS1, ESS3, and ESS6, the Environmental risks and impacts are characterized as High for the project. While the SHIIP project itself involves technical assistance and is not expected to result in direct environmental impacts during its implementation, it prepares the ground for subsequent infrastructure investments in roads, energy, ports, and digital sectors. These follow-on subprojects are likely to have significant environmental and social footprints, some of which may be adverse and potentially irreversible, such as dredging for port development, large-scale land clearing, and infrastructure development in ecologically sensitive areas.

Due to the scale, geographic spread, and sectoral diversity of the future infrastructure pipeline being supported, cumulative environmental impacts are expected to be substantial. These may include:

- Loss of vegetation covers and habitat.

- Degradation of natural ecosystems.
- Disruption to biodiversity, including endangered and migratory species.
- Illegal hunting or poaching pressures in newly accessible areas; and
- Risks to sensitive flora and fauna due to land-use change and pollution.

100. On physical environment most risks and impacts could be seen during construction phase due to site preparation and civil works, and may include, but limited to soil erosion, land contamination, groundwater pollution, sedimentation, surface water pollution, and air emissions, as well as extensive use of energy, water and aggregates resources. The subprojects may likely include the use of a range of materials like asphalt, cement and others during their construction phase. In addition, in the possible subsequent follow-on projects there might be significant users of material resources like gravel and stone from borrow pits and quarries. The projects implemented may therefore likely be significant users of energy, soil, water and other natural resources. To a lesser extent, pollution of water, land and air can still exist during operating the roads and other subprojects due to intensive vehicular movement, industrial emissions, effluents, hazardous and non-hazardous releases to environment.

101. Significant risks exist in Somalia related to climate: Reference to ESS1, ESS3, and ESS6, Climate change will increasingly impact Somalia for the foreseeable future due to many factors. Climate-related impacts are already being felt and will likely increase in magnitude. The impacts include higher average temperatures, increasing frequencies and severity of drought, changing rainfall patterns, and increased climate variability and uncertainties thereof, especially for the rain-fed farming systems in south-central Somalia. These conditions have a bearing on agricultural production and national economic trends. The recent devastating droughts in the country, which have been linked to climate change, adversely affected not only the prospects for sustained economic growth across the country, but also contributed to displacement and general insecurity in large parts of the country. The changing climatic patterns have implications for Somalia's national infrastructure assets and future plans.

Key social risks and impacts including community health and safety

102. Reference to ESS1, ESS4, ESS5, ESS10, and from the nature of the proposed menu of activities and in consideration of the broader country context and system, and consistent with precautionary and conservative approach, the following are the potential social risks and impacts on Community Health and Safety:

a) *Community health and safety:* during site preparation and civil works, there will be need for mobilizing construction materials, equipment, and heavy machinery, as well as setting up necessary working camps. This in turn will expose nearby community members to a variety of safety risks as they purposefully or non-purposefully attempt to approach the working site, including general injuries of unauthorized access and unsafe vehicular and pedestrian diversion of movement, on a daily basis.

b) *Fire Hazards and other health issues:* wherever close to project sites, the community members will still be subject to catching fire hazards at work sites, if it occurs, either because they're settling nearby storage/ working sites, or accidently moving close to these locations. Other health-related risks and impacts may include respiratory and disorder issues due to dust, vehicular emissions, noise, and vibration.

c) *Traffic and road safety:* site preparation and the need to establish diversion routes during construction/ rehabilitation, the road users may be faced with a new passage setting, thus a to new set of unexpected movement risks and hazards.

d) *Labor influx and associated risks:* The infrastructural works resulting in labor influx during construction phase is high. Labor influx in the backdrop of weak labor management systems combine to exacerbate other risks such as child labor, human trafficking, failure to adhere to

Occupational Health and Safety for workers, labor disputes over terms and conditions of employment, discrimination and exclusion of vulnerable/disadvantaged groups and exposure of security workers to attack by armed groups.

e) *Gender Based Violence:* The risks of gender-based violence (GBV) including sexual exploitation and abuse (SEA) is assessed as substantial, based on the proposed nature and scope of infrastructural works, weaker mitigation systems and lower absorption capacity and the potential risks associated with labor influx in project-affected communities.

f) *Insecurity risks:* Protracted conflict and insecurity in some parts of Somalia makes direct access to project sites for effective stakeholder engagement and community participation including grievance redress challenging. It potentially puts project workers in imminent danger of attacks and kidnapping by armed groups.

g) *Selection bias and elite capture:* In the context of fragility, endemic poverty and the formal state machinery still emerging against a backdrop of protracted conflict, the probability of project activities and site selection being influenced by complex clan-based and social dynamics, rather than the logical dictates of analytical and feasibility studies, Detailed designs is very much probable.

h) *Exclusion/ Lack of engagement:* Exclusion in this Project, as with the general case in Somalia is expected. That may include risks of inaccessibility to Project benefits by people, as they may be discriminated against and excluded due to disability, gender, geography, income, age or other characteristics. Also, particular needs of segments of society, including vulnerable groups such as children, youth, persons with disabilities, people living with HIV, older persons, marginalized peoples, and internally displaced persons may not be met. Further, with security being a considerable risk, the risk challenge of ensuring the project reaches the poor, vulnerable and minorities is amplified.

i) *Inadequate capacity:* Despite the deployed expertise, capacity for E&S risk management of the Project remains limited, more so for large infrastructure projects spanning several ministries and a massive geographic footprint. There is a dearth of sufficient E&S risk management capacity in Somalia. There are very few policies, laws, and regulations for national or State-level environmental and social oversight of development activities. There is virtually no institutional framework that would serve as anchor for E&S risk management.

Key risks and impacts on project workers

103. Reference to ESS1 and ESS2, adverse impacts will be also expected on workforce, which could result in health issues on site workers, if not managed properly. These Occupational Health and Safety (OHS) issues are typical to civil works in the roads and transport industry, as well as in energy and ports industries. That may include, but not limited to, slips, trips and falls, getting stuck by objects or in confined places, over-exertion, electrocution, working in heights, injuries by moving machinery, hearing and respiratory problems, traffic accidents, risk of disease transmission, exposure to other emergencies like fire, flood, and heat shocks. Of special concern is exposure to dust, chemicals, hazardous (incl. Asbestos, if found) or flammable materials and wastes in a combination of liquid, solid, or gaseous forms.

104. Project workers can also be exposed to a variety of non-OHS issues concerning their terms and conditions of employment, payment, leaves, and resting hours, as well as termination rights, among others. It's also expected that Project workforce may face discrimination based on personal characters, unequal employment opportunities, mainly due to nepotism, intimidation, sexual harassment, exploitation and GBV. In particular, Project civil works may encounter child labor, forced labor, and labor influx issues, where labor inspection is absent or ineffective. This also includes risk of child/ forced labor at offsite locations where ancillary activities will take place (quarries, borrow pits, raw material sites, etc.).

Key risks and impacts related to land acquisition, restrictions on land use and involuntary resettlement

105. Reference to ESS1 and ESS5, risks and impacts relevant to land acquisition, restrictions on land use and displacement are expected in this Project. Land acquisition potentially including physical and economic displacement is likely for project infrastructure activities such as roads, ports and transmission lines. This risk is compounded by gaps in legal and regulatory frameworks that make land appropriation and asset valuation challenging.

106. A Resettlement Policy Framework (RPF) will be prepared prior to the first call of bids for specific feasibility and design studies. The RPF will also include screening criteria to assess the need, quantum and severity of impacts. The RPF will emphasize the development of detailed measures to avoid, minimize, manage and compensate for risks and impacts associated with land acquisition, restriction to land use, economic displacement and resettlement. Once the specific sites have been identified, site specific Resettlement Action Plans (RAP) or Livelihood Restoration Plans (LRP) consistent with ESS5 will be developed, cleared and implemented as appropriate along with the technical detailed designs prepared under the project. Based on survey numbers of PAPs, either a detailed site-specific Resettlement Action Plan (RAP), Livelihood Restoration Plan (LRP) or a site-specific Abbreviated Resettlement Action Plan (ARAP) should be prepared, consulted upon, and implemented, before commencement of construction activities.

Key risks and impacts on cultural heritage

107. Reference to ESS1 and ESS5, most of the interventions (projects) in the larger program are not expected to have a direct negative impact on cultural heritage. Although there is a possibility that the suite of infrastructure options to be implemented as successor projects to this, such as roads and energy projects, may likely involve impacts on tangible and intangible cultural heritage. There is the potential for finding artifacts of cultural or archaeological significance during construction phase that could potentially be impacted. Risks and impacts associated with intangible cultural heritage could include, among others, disruption to religious/cultural festivity in the community by civil work. Subproject specific ESMPs in successor projects will address these issues through the inclusion of site-specific mitigation measures and chance find procedures. Annex 8 ("Protection of Cultural Property") in this ESMF details the procedures that are to be followed in the fulfilment of management and preservation on cultural property and artefacts, including a proposed Chance Find outline procedure.

6.3. Proposed Mitigation and Monitoring Measures

108. Table 4 presents indicative mitigation measures to address potential environmental and social (E&S) risks and impacts of the Project. For social risks, this table should be read in conjunction with the updated SEP and LMP, which provide more detailed risk assessments and mitigation strategies. Similarly, for environmental risks, Table 4 should be referenced alongside relevant sections of the ESMF to ensure consistency and integration of risk management approaches. Implementation of these measures will be monitored and reported through mechanisms described in the following section. Their effectiveness will be regularly reviewed and adapted throughout the project lifecycle. Site-specific E&S monitoring indicators will be further detailed in area-based, activity-based, or site-specific subproject ESMPs.

Table 4: Indicative E&S Mitigation Plan and Monitoring Indicators

Potential E&S risks and impacts	Proposed mitigation measures	Indicators for monitoring
Security risks	• Prepare and implement security management plans (SMP) in each district/ region in line with ESS4 and WB GPN on the use of security personnel including code of conduct (refer to Project's LMP for sample CoC), incident reporting, grievance redress and	# of reported insecurity incidents Security allegations relevant to the Project.

Potential E&S risks and impacts	Proposed mitigation measures	Indicators for monitoring
	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, or virtual, when necessary. See engagement requirements set out in SEP. • Minimize the time spent collecting field 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.	
Noise pollution	• Restrict construction working hours between 7am to 5pm. • Educate workers for noise reduction measures, including promoting best management practices based on relevant international standards. • Ensure an effective routine maintenance for construction vehicles and machinery. • Consideration of, if necessary, 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 to work PPE (ear plug/earmuffs) for all workers involved in the areas where elevated noise levels expected. • The contractor should use equipment that is in good working condition and are periodically serviced.	Recorded cases of complaints by the project workers and community members Noise levels are within national and international permissible thresholds. (site measurements)
Fire hazards onsite, especially in confined areas, such as the PCU offices and in the materials testing laboratories	• Provide fire hazard training to construction workers. • Provide fire distinguishing/ site evacuation drills to office workers. • Provide fire extinguishers that are appropriately managed. • Designate areas as fire “assembly points”. • Establish, where possible, live fire breaks in form of appropriate vegetation.	# of fire extinguishers installed # of fire hydrants installed # of assembly points designated Fire drills provided and project participants engaged.
Air pollution	• Train workers about air pollution impacts from construction activities on human health, and good practices to avoid, reduce and mitigate.	# of complaints related to air pollution Air pollutants are within national and international

Potential E&S risks and impacts	Proposed mitigation measures	Indicators for monitoring
	• As feasible, minimize presence/ working events at sites with exposed soils (source of particulate material). • Sprinkle water on exposed road surfaces, as appropriate. • Proper storage of road base materials and covering of stockpiles (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 conditions. • No unauthorized slash-and-burn activity.	permissible thresholds. (Site measurements) Worker training records
Water resources pollution	• Educate workers about chemical hazards, and risk of pollution to water resources. • Proper handling and storage of contaminants away from water resources. • Proper waste management onsite, and legal dumping/ final treatment. • Proper effluent and sedimentation management onsite, especially in areas close to 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, stream and other water sources. • Prohibit significant releases into surface or ground water and maintain register of types and quantities.	# of complaints or incidents recorded Water pollutants in surface and groundwaters, as well as quality of effluents are kept within national and international permissible thresholds. (Site measurements)
Land contamination	• Train workers about chemical hazards • Proper chemical, material and waste handling and storage • Effective vehicular and machinery maintenance • Maintain a register of any spills, including bitumen, solvents, fuels, lubricants, chemicals, or other similar petroleum products. • Ensure proper site cleanup and closure upon completion of construction works.	# of incidents recorded # of grievances registered Land contaminants are kept within national and international permissible thresholds. (Site measurements) Worker training records Site inspections
Loss of flora and fauna Loss of vegetation cover	• Minimize unnecessary vegetation clearance. • Where vegetation/trees cut down, consider plant replacement. • Sensitize workers about fauna conservation. • Discourage fauna killings and set penalties for killing them.	# of trees cut and planted # of grievances recorded Sites inspection Records of sensitization workshops
Mismanagement of solid waste	• Train/sensitize workers about proper waste collection, storage and disposal.	# of waste bins at the sites

Potential E&S risks and impacts	Proposed mitigation measures	Indicators for monitoring
	• Preparation of site-specific waste management plans for each waste stream and implementation of the waste hierarchy, as part of the sub-project ESMPs. • Disposal of project-generated wastes at Municipal approved sites only, including scarified surfaces if couldn't be recycled. • The contractors shall ensure provision of waste bin at the project sites in populated areas 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 of. • Use of durable, long-lasting materials that shall not need to be replaced often. • Ensure waste is collected and disposed of in accordance with Somalia Government regulations. • Always maintain register of types and quantities, as well as final treatment options.	# of site-specific waste management plans Volume of total waste generated % of waste collected Worker training records
Occupational Health and Safety (see Annex 5 for a detailed list of measures)[18]	• 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 and places for rest away from direct sun or rainfall. • 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 temporary fall prevention devices, such as rails, full body harnesses and energy absorbing lanyards, where possible. • Electrical works should be performed by trained and qualified experts. • Ensure that electrical equipment is properly connected before switching on sockets.	-Accident logs -First Aid Kits -Fire extinguishers -Insurance policy -Use of PPE by workers -Training record -Presence of drinking water supply Review of OHS Plan Site inspections

[18] World Bank Group's Environmental Health and Safety Guidelines (EHSGs) – General

Potential E&S risks and impacts	Proposed mitigation measures	Indicators for monitoring
	• In case on any spillage at working areas, this should be cleaned off immediately, anti-slip hazard warning when mopping floors should be provided to reduce chances on slips and falls. • 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.). • Provision of adequate appropriate 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 a nearby hospital. • Ongoing monitoring and reporting of OHS performance. • 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, and in particular COVID-19	• Train all staff on the signs and symptoms of COVID-19 and other infectious diseases, how they spread, how to protect themselves and the need to be tested if they have symptoms. • Use existing grievance procedures to encourage reporting of co-workers if they show outward symptoms, such as ongoing and severe coughing with fever, and do not voluntarily submit to testing. • All workers and visitors accessing work sites every day or attending meetings shall be subjected to rapid Covid-19 screening which may include temperature check and/or other vital signs. • Mandatory provision and use of appropriate PPE such as masks shall be required for all project personnel including workers and visitors. • Provide hand wash facilities, water and soap, alcohol-based hand sanitizer and mandate their use on entry and exit of the project site and during breaks. • Avoid congregation of more than 15 workers at one location. Where more than one person gathered, maintain social distancing of at least 2 meters.	# of reported cases at site Vaccination programs provided onsite. Workers and community complaints Sensitization reports

Potential E&S risks and impacts	Proposed mitigation measures	Indicators for monitoring
	• Restriction of the number of people accessing the work areas. • Fumigation of offices and work areas. • Train all workers in respiratory hygiene, cough etiquette and hand hygiene. • Train cleaning staff in effective use of PPE, cleaning arrangement and procedures and disposal of waste generated from the PCU offices across the project regions.	
Traffic and Road Safety	• 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 PCUs 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 target districts/ regions. • All drivers and loaders should sign the Code of Conduct (CoC). • Drivers (especially going to high insecurity areas) should follow guidance on safe emergency driving. • Public notification for planned road closures, road deviations, and construction works. • Information to direct 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. • Clearance of road and footpath from construction wastes, materials or equipment • As appropriate, separation of work areas from public spaces/areas such as 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.).	# of accidents recorded, #Vehicle inspection reports Trip Management Plans Vehicle inspections
Poor management of ESHS risks, as well as risks to community health and safety	• Establish and maintain continuous liaison with the urban communities in the project's districts and regions in which project activities and interventions are implemented, including sensitization on ESHS risks and mitigation measures.	# of ESHS incidents occurring EHS training programs and participants

Potential E&S risks and impacts	Proposed mitigation measures	Indicators for monitoring
	• Eliminate unauthorized access to Project's sites. Provide warning signage and fencing. • 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.	Site inspection
Management of chemicals and hazardous Materials	• Educate workers about proper management of chemicals, hazardous materials and waste management (use, storage, collection, transport and disposal). • 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. • 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. • 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 Municipal approved sites only. • Ensure proper cleanup and closure upon completion of work	# of waste management plans Volume of total waste generated % of waste collected Training records Site inspections
Labor risks other than OHS: i) labor influx; ii) social tensions; iii) labor disputes over terms and conditions of employment; iv) Child labor risks, and v) discrimination and exclusion of disadvantaged/ vulnerable groups	Implement the LMP including the following: • all contracts shall have contractual provisions to comply with the minimum age requirements including penalties for non-compliance. The contractor is required to maintain labor registry of all contracted workers with age verification. Verification of the age shall be undertaken prior to the engagement of labor 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 labor 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 the national Labor Code in contracts.	Labor registry with breakdown information of project workers (age, gender, contact info, etc.) # of reported cases of disputes by workers Review of employment contracts Review of GRM

Potential E&S risks and impacts	Proposed mitigation measures	Indicators for monitoring
	• Develop and operationalize GRMs 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 labor incidents as detailed in the LMP (Where a young-looking person's age cannot be confirmed, use the Grievance Redress Committee (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).	
Physical and economic displacement	Comply with the RPF, including the following: • Prepare and implement the RAPs/LRPs subject to WB approval, for each of the sub-projects with significant displacement or land restriction issues. • Ensure all displacement 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 Sensitizing 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. • Securing funding for compensation immediately after RAP/LRP approval to and depositing this money in a designated bank account. • Prior to handing-over of roads/site to the contractor ensure the RAP/LRP has been implemented and attach an indication of this to the right to proceed document provided to the contractor. • Involvement of affected communities in the verification process	Clearance and public disclosure of the RAP RAP/LRP completion report with evidence of compensation payment Grievances recorded Training records
SEA/ SH and other forms of GBV	Implement the Project's GBV Action Plan including the following: • Hiring of a GBV Specialist in the PCU for the project implementation and monitoring. • Signing CoC for project workers; and planning for sensitization/ awareness raising for the community and intended training activities for workers on CoC and SEA provisions. • Mapping and partnering with identified GBV service providers. • Establishing a Report and Response Framework that outlines key requirements for reporting cases if they arise and measures to enable safe, ethical, survivor-centered response.	Progress report of the GBV action plan Number of female workers engaged in each subproject Incidents reporting

Potential E&S risks and impacts	Proposed mitigation measures	Indicators for monitoring
	• An Accountability Framework that outlines how the PCU/ contractor will handle allegations, including related to investigation (in alignment with national processes) and sanctions for potential perpetrators. • Establishing of special channel/ procedures for safe, confidential reporting of GBV incidents that connect to the project GRM, and enabling training of GRM operators on how to respond to cases that come forward. • Developing of additional protection measures to address potential sexual harassment in recruitment practices and in the workplace. • Clarifying 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. • Engaging of female workers in project civil work • Arranging enough and suitable toilet and washing facilities, separate from men and women workers.	
Lack of inclusive stakeholder engagement	Implement the SEP, including the following: • Identify disadvantage groups in each subproject SEP. • Establish and maintain continuous liaison with the communities including disadvantaged groups. • Facilitate the participation of vulnerable groups in consultations (such as provision of transportation and accessible venues). • Establish GRCs involving vulnerable groups. • Inform and sensitize all stakeholders on GRM.	# of disadvantaged groups consulted # of disadvantaged groups in the GRC Functionality of GRM (review of grievance logs and actions taken)
Inadequate capacity	• Undertake a training needs assessment for all the PCUs 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 team. • Monitor the performance and provide continuous technical support to the PCU.	Training needs assessment report Training protocols List of staff trained

6.4. Resource Efficiency and GHG Emission Avoidance Procedures

109. In alignment with the World Bank's Environmental and Social Standard 3 (ESS3) and the commitments outlined in the Environmental and Social Commitment Plan (ESCP), all SHIIP-financed subprojects shall integrate procedures to ensure the efficient use of resources and the avoidance or reduction of greenhouse gas (GHG) emissions. These requirements are particularly important for successor projects during the feasibility, design, and implementation phases.

The following procedures will be applied:

- Screening for High Resource Use: During subproject screening, activities that are likely to consume large volumes of energy, water, or raw materials will be flagged for further analysis.
- Design Efficiency Requirements: Engineering designs shall incorporate energy-efficient technologies, water-saving fixtures, and locally available sustainable construction materials. Design reviews will assess alternatives that lower GHG emissions and optimize resource inputs.
- Climate-smart Design Integration: All feasibility studies and detailed engineering designs shall evaluate low-emission alternatives, including renewable energy use, modal shifts (where applicable), and green infrastructure solutions.
- GHG Estimation and Reduction Plans: Where applicable, GHG emissions will be estimated using internationally accepted methodologies. Subprojects expected to generate significant GHGs must prepare and implement mitigation plans that prioritize avoidance, reduction, and efficiency.
- Procurement and Construction Practices: Contractors will be required to comply with guidelines promoting resource-efficient methods and materials. Environmental and social specifications will include clauses for minimizing fuel consumption, waste generation, and emissions.
- Monitoring and Reporting: Resource use and emission performance indicators will be included in the Environmental and Social Monitoring Plan (ESMP) of each subproject. Monitoring reports will be submitted quarterly by the implementing agencies and reviewed by the PCU.

These procedures are intended to ensure that all SHIIP subprojects, especially successor investments, adhere to sustainability principles and contribute to the broader climate and environmental goals of the project.

6.5 Environmental and Social Screening Process

110. The objectives of screening are to (i) screen the E&S risks and impacts of a subproject; and (ii) determine the type(s) of mitigation measures, assessment, specific plan(s) or safeguard instrument(s) to be prepared based on the outcomes of the screening. The screening process is used to identify eligible or ineligible project activities and interventions for further or no E&S assessment, respectively. This is done by analyzing the proposed activities and interventions in relation to their E&S context (area of influence) using a checklist approach (Annex 6). It is essential to state that from a general program conceptualization perspective, the SHIIP has been classified as High Risk. Nonetheless, While SHIIP is rated as a High-risk operation overall, the environmental and social screening process will help inform decision-makers and project managers about the specific nature, scale, and level of E&S risks and impacts associated with each subproject. This ensures the application of proportionate mitigation measures and appropriate safeguard instruments tailored to individual subproject risk levels."

111. The E&S safeguard screening will occur during the project preparation stage as soon as the fairly accurate site locations are known for the sub-project(s). This sub-section sets out the procedures (Steps 1-6) for identifying, preparing and implementing the project component; E&S screening; preparation of required E&S plans; consultation on such plans; review and approval; and implementation.

Step 1: E&S Screening of sub-project activities and sites

112. Once field visits and investigations have been completed by the PCU, Scoping will be conducted to identify the various aspects (sub-activities) that could have significant E&S risks and impacts. The scoping activity will identify issues of critical concerns and seek to provide solutions to issues such as:

- What are the potential risks and impacts from the execution and operation of the proposed sub-project?
- What will be the magnitude, extent and duration of the risks and impacts?
- What relevance are the impacts on the environmental and social, contexts? Consequently, scoping will be used to identify the biophysical, health, and socioeconomic components of the environment that will significantly be affected by the proposed sub-project activities.

113. Key Considerations for Proposed Environmental and Social Assessments to be Prepared under SHIIP:

a) The E&S assessment should be based on current baseline information (which can be obtained through literature reviews, field studies, stakeholder engagement, etc.), including an accurate description and delineation of sub-projects and any associated aspects.

b) It should include collection, collation, analysis and interpretation of E&S baseline data at an appropriate level of detail sufficient to inform characterization and identification of risks and impacts and mitigation measures.

c) The assessment should evaluate the SHIIP components' activities i) Potential E&S risks and impacts; ii) Examine project alternatives; iii) Identify ways of improving project selection, siting, planning, design and implementation in order to apply the mitigation hierarchy for adverse E&S impacts and seek opportunities to enhance the positive impacts of the project.

d) The E&S assessment will include stakeholder engagement as an integral part of the assessment, in accordance with ESSs 1 and 10.

e) The E&S assessment should be an adequate, accurate, and objective evaluation and presentation of the risks and impacts.

f) Assessment of cumulative, induced, and transboundary impacts, including climate change vulnerability and adaptation considerations, to ensure that combined effects of SHIIP and other developments are captured.

g) Project Coordination Units responsible for SHIIP will procure qualified and experienced professionals and also retain independent specialists to carry out the E&S assessment.

114. The screening procedure strengthens accountability to the communities targeted for support, stakeholders in the development processes, and the broader development portfolio. E&S screening and assessment processes for projects have become standard practice in development cooperation and are usually required by national regulatory frameworks and multilateral and bilateral development partners. Therefore, the application of the E&S screening and review processes demonstrates the appropriateness of safeguard measures. The initial screening for the selection of the subprojects shall be conducted based on the following exclusion criteria.

- Activities that may cause long term, permanent and/or irreversible impact on biodiversity and habitat.

- Activities that may have significant adverse social impacts and/ or may give rise to significant social conflict.
- Activities that may involve forced displacement or massive land acquisition.
- Activities that may involve impacts on cultural heritage without the full consent of the community.
- Activities that may involve non agreement on land acquisition and resettlement procedures as per RAP.
- Non availability of budget to timely compensate as per RAP.
- Activities in high insecurity area/inaccessible area due to conflict and security risks as per project Security Management Plan.

Step 2: Assigning of E&S Risk Classification

115. Assigning an appropriate E&S risk classification to a sub-project activity shall be based on information provided in the E&S screening form Annex 2. E&S focal points shall undertake the E&S screening process and assign the appropriate risk classification for each subproject – Low, Moderate, Substantial, or High – based on the screening results and in accordance with ESF ESS1 Guidance Note. The classification does not alter the overall High-risk rating of SHIIP but ensures tailored E&S planning at the subproject level (refer to section 13.1 of Annex 1).

Development of E&S Instruments Based on Screening Results

Preparation of Environment and Social Instruments

116. Based on the E&S screening of the sub-projects, the E&S focal points will recommend the preparation of the relevant E&S instruments. These may include Environmental and Social Impact Assessment (ESIA), Environmental and Social Management Plan (ESMP), Resettlement Action Plans

117. RAP, and others. The reports will be submitted to the PCUs Environmental and Social Specialist for review and quality assurance, and thereafter to the World Bank for review and approval. Similarly, the reports will be submitted to the relevant authorities (Ministry of Environment) for review and licensing.

118. The PCUs will hire the services of independent E&S Specialists to carry out the E&S assessment. “Independent” means that specialists are able to provide professional, objective, and impartial advice, without consideration of future work, and avoid conflicts with other assignments or their own business or personal interests.

119. The PCUs Safeguards Specialist’s duties include backstopping the sub-projects implementing teams to comply with the relevant National E&S requirements and the World Bank’s ESF requirements. This includes reviewing, screening, approving, monitoring and reporting on the progress of the sub-projects. The SHIIP Technical persons hired by the ministries (Environment and Social Consultancy Firm) should guide the formulation and development of the sub project specific ESMPs for the project, and periodically (quarterly) review and improve capacity to manage safeguards compliance amongst local stakeholders.

Review and Approval

120. The E&S Instruments prepared for civil works shall be reviewed by E&S Specialists of PCU at MPWRH and cleared by World Bank. Once they are cleared by the World Bank, they will be submitted to the Ministry of Environmental and any other state level authorities for approval and licensing. The Authority shall review the draft E&S impact study and provide the project proponent with written comments within thirty (30) days of its receipt. After review of the draft E&S impact study, and the Authority is satisfied that it is complete, then proponent shall be notified in writing. Where the (ESIA), or (ESMP) study reports are found to be inadequate, the

Authority shall return them to the proponent for revision, taking into consideration the comments and objections of the Director General.

Public Consultations and Disclosure

121. In carrying out the ESIA or ESMP, supporting evidence of comprehensive public consultation shall be required, such as signed minutes of consultation meetings, attendance lists and filled questionnaires.

Public consultations shall take place at three key stages:

1. During E&S Screening: To identify initial concerns and baseline conditions.
2. During Impact Assessment: To present and explain the detailed potential impacts and proposed mitigation measures, allowing stakeholders to review and provide feedback on the draft findings.
3. During Validation of the ESIA/ESMP Report: To confirm that stakeholder inputs have been adequately addressed and to finalize the report.

The results of the public consultation shall be documented and incorporated/influence the design of mitigation and monitoring measures. ESIA/ESMP study reports for the subproject shall be disclosed in-country by the client (MPWRH) in formats that are accessible to all project stakeholders and on the World Bank external website. Public consultations should be conducted in a manner accessible to all project stakeholders, and taking into account the guidance set out in the project SEP and any other relevant guidance, such as the Technical Note: A notice of the meeting shall be communicated at least seven (7) days before the actual meeting date.

Implementation Monitoring and Supervision

122. All the activities to be financed under the SHIIP will follow the ESF, environment and social standards and the provisions described and agreed in the Project's ESCP, and other due diligence instruments prepared to ensure proper management of environment, social, safety and health requirements. E&S monitoring seeks to check the effectiveness and relevance of mitigation measures through the implementation/operation phase. The PCUs Environment and Social focal points shall monitor project activities and interventions.

Chapter 7 – Institutional Arrangements and Capacity Building

7.1. Institutional Arrangement of the Project and ESMF

123. The Project will be implemented by FGS through the Ministry of Works, Reconstruction and Housing with involvement and consultation with technical contributions by beneficiary ministries and with the participating Federal Member States (FMS) on relevant activities. Financial management will be conducted by the External Assistance Fiduciary Section (EAFS) within the Ministry of Finance.

124. Project-level E&S standards responsibility will be with specially appointed units within the participating line ministries. The Ministry of Environmental, domiciled at the Office of the Minister of Environment and Climate Change and Contractor information, is expected to have a cross-sectoral oversight role in the management of environmental risks and impacts while discussions on the identification of a similar entity for the management of social risks and impacts are ongoing. While the contemporary capacity of the Ministry of Environmental to undertake robust environmental and social Risk management is limited, this project will inject significant institutional capacity enhancement efforts in the Directorate, boosting the available skills and competencies to deliver on infrastructure projects and programs. Similarly capacity enhancement support would need to be extended to other relevant Government departments as per the Capacity Building Action Plan.

125. The project's spatial planning requires active engagement and technical contributions by several beneficiary Ministries. Principal involved ministries include the MPWRH, MPMT, the MTCA, the MCT, the Ministry of Energy and Water Resources, the Ministry of Fisheries and Marine Resources, and the Ministry of Environmental and the Ministry of Finance for project oversight.

126. A Project Coordination Unit (PCU) is to be established within and hosted by the Ministry of Public Works, Reconstruction and Housing to coordinate the project's implementation. This unit will be responsible for the overall project implementation and coordination with stakeholders. The technical line ministries will be responsible for technical inputs for activities relevant to their sectors, with specific responsibilities clarified within a series of Memorandum of Understanding (MoU) between the PCU and sectoral ministries to ensure agreement and buy-in

127. A Technical Steering Committee (TSC) consisting of the Directors General of the beneficiary ministries and chaired by the DG Ministry of Finance will oversee the project. It is expected that the steering committee will convene at least three times annually to review the project's progress in meeting its Project Development Objectives (PDO), monitor updates of the results framework for the project and guide corrective measures as may be warranted. The PCU will act as a Secretariat to the TSC.

128. The PCU will be responsible for coordinating the implementation of the project and providing project management oversight, while beneficiary agencies will take responsibility for the technical aspects of project activities and technical approval of deliverables. In particular, the PCU will take responsibility for:

- Coordinating with beneficiary Ministries,
- Procurement and contract management,
- Financial management and interface with the EAFS system in the Ministry of Finance,
- Integration of E&S safeguards issues in all studies and activities supported under the project
- Monitoring and evaluation
- Overall quality control in preparation for activities and in their execution
- Communications and beneficiary engagement

129. Sectoral ministries/agencies will be responsible for:

- Participating in Technical Steering Committee to provide project governance
- Identifying and scoping relevant activities to be completed under the project
- Preparing initial Terms of Reference for relevant activities and technical inputs in selection of consultants and in procurement, including engagement considerations
- Providing technical oversight and guidance of relevant project activities
- Providing signoff of relevant deliverables in terms of technical quality
- Coordinating with FMS on project activities relevant to a given sector

130. To guide the working modalities between the PCU and sectoral ministries, trilateral memorandums of understanding (MOU) would be prepared. It is expected that the MoUs would be signed by the Minister of Public Works, Reconstruction and Housing and the PCU Coordinator on one side, the Minister of the sectoral ministry, and the Prime Minister or Minister of Finance. The MOUs will be subjected to public scrutiny.

131. It is expected that the PCU would include approximately have 10 key staff. Staff will be engaged locally under the Terms of Reference agreed with the Word Bank through a competitive and transparent processes and may include civil servants as well as specialists sourced locally. The PCU will be supported by additional administrative staff as and if such capacity is deemed necessary. Initially, the PCU will be staffed with a full-time PCU coordinator, a full-time environmental specialist, a full-time social development specialist, a full-time communications and stakeholder engagement specialist, as well as Project Management Teams (PMTs) for counter coordination and implementation in other participating FMSs and SL.

132. The PCU will be established and gradually strengthened with the support of component 4 of the project. While the PCU's objective would be to ensure the project is successfully implemented, its constitution reflects the range of capacities most government infrastructure entities would require for sector management. As such, the PCU can be considered in the medium term as a nascent start of capacities required by a sectoral authority. The formulation, experience and training PCU staff will receive will consider the unit's evolution over time to possibly take a more formal sector role.

133. It is foreseen that for the duration of the project, external technical assistance to the PCU will be required. This will be provided through engagement of a consultancy firm for provision of 1 or 2 senior advisors (with expectation of significant field presence) to work directly with the PCU for the duration of the project and in addition to technical advisors, the project will also recruit one or two Senior Environmental and Social (E&S) Advisors with extensive experience in environmental and social safeguards implementation in fragile and conflict-affected settings. The ToRs for such advisors would clearly identify the responsibility to advise, support and strengthen PCU staff, but not be responsible for preparing PCU outputs. Such technical assistance would include a provision for ad-hoc capacities that can be temporary and short notice drawn-on if needed. Such draw-down TA could be used, for instance, to temporarily augment specific technical capacities, to undertake specialized and targeted capacity building and to address particular challenges and problems as they may arise.

7.2. Contractors/ Site Engineers Responsibilities

134. The Contractor to be engaged for civil works under the SHIIP will be responsible for the following. More details are provided in the Project's LMP:

- Employ or appoint qualified environmental, social, occupational health and safety experts to manage ESHS issues.
- Prepare and implement their labor management procedure (Contractor's LMP) and Contractor's ESMP (including OHS provisions) which will apply to the contracted workers who work on the subprojects. These procedures and plans will be submitted to the PCU for review and approval before the contractor is allowed to mobilize to the field (Annex 6 provides indicative environmental stewardship that can be useful in preparing the C-ESMP).
- Involve the PCU 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 keeping records of these trainings.
- Require the primary supplier to identify and address risks of child labor, forced labor 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. Grievance Redress Mechanisms 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 Code of Conduct prior to the commencement of works, take all other measures to address risks of sexual exploitation and abuse (SEA)/sexual harassment (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 personal protective equipment (PPE for workers at the sites given the specific worker OHS risks.
- Immediately Report to PCU on labor, OHS accident, or significant environmental event (e.g., spill, release, emergency), any chance finds during project implementation.
- Report to PCU on labor and occupational health and safety performance.
- Participate in the induction training on ESMP provisions and requirements delivered by the PCU. Ensure that all workers, including site supervisors and management participate in training sessions delivered by PCU.
- Based on the results of C-ESMP monitoring, cooperate with the PCU and Supervision Engineer to implement E&S corrective actions and plans, as necessary.
- Respond promptly and efficiently to requests and instructions from PCU for environmental corrective actions and implement additional environmental and social mitigation measures, as necessary.
- Coordinate with PCU 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 plans.

Contractor and Site-Level Responsibilities for E&S Compliance:

135. To effectively fulfill their environmental and social responsibilities under the SHIIP project, Contractors and Site Engineers will be required to engage a qualified Environmental and Social Specialist. This specialist will be responsible for supporting the implementation of the (C-ESMF), supervising compliance with (OHS) standards, overseeing adherence to the Codes of Conduct, and facilitating regular environmental and social training for workers.

The Environmental and Social Specialist will also provide day-to-day oversight of subcontractors, ensure alignment with World Bank's (ESF) requirements, and contribute to site-level monitoring, documentation, and reporting of E&S compliance. Their involvement is essential to ensure that site-level safeguards are implemented consistently, risks are mitigated proactively, and grievances are addressed.

136. 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.
- Labor 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; and
- Chance finds management plans.

137. The Engineering/ Supervision Consultant. The PCUs will be supported by engineering and supervision consultants who will be responsible for the following:

- Contractors and their site engineers shall have key responsibilities for environmental and social risk management during civil works execution. This includes implementing the C-ESMP adhering to labor and OHS requirements, training workers on CoCs (Codes of Conduct), engaging with local communities, maintaining a functioning GRM, monitoring environmental quality, and submitting compliance reports. They will also oversee subcontractors and ensure all ESMP provisions are implemented at the worksite..

- Provide day-to-day construction supervision for civil works as well as monitoring adherence to the safeguard instruments related to environmental, occupational health, and safety. To do so, the Engineering/Supervision Consultant shall appoint qualified environmental, social, and occupational health and safety (OHS) specialists as part of their core team. This team must

include a specialist with specific expertise in Gender-Based Violence (GBV) to supervise related risks and ensure implementation of GBV action plans.

- Submit weekly reports related to project ESHS performance. In addition to monitoring, the Consultant will provide hands-on technical support and guidance to contractors and site engineers to ensure effective implementation of ESF requirements and C-ESMP provisions.

To effectively fulfill these responsibilities, each contractor will be required to engage a qualified Environmental and Social (E&S) Specialist to support C-ESMP implementation, compliance monitoring, and worker/community engagement in accordance with the ESF and national requirements.

7.3. Capacity Building

138. The World Bank team will provide hands-on training and capacity building to the PCU to ensure it becomes operational quickly and will be able to effectively handle management, coordination, oversight, and implementation support for the SHIIP. More specifically, the E&S teams under the PCU, will be engaged in a series of induction sessions on E&S safeguards responsibilities and assessment approaches, which will also include ESMP development and implementation.

139. The Federal MPWRH will provide advice to project teams as needed to support the implementation of this ESMF and the preparation, implementation and monitoring of E&S management plans/ measures.

140. The Technical Steering Committee will have the final responsibility for the integration of ESMPs in the execution of the Project. The integration of those plans will need to consider particular institutional needs within the implementation framework for application of the ESMP, including a review of the required budget allocations for each measure, as well as the authority and capability of institutions at different administrative levels (e.g., Locality, State, and National), and their capacity to manage and monitor ESMP implementation. Where necessary, capacity building and technical assistance activities will be included to enable proper implementation of the ESMP. Information on the training topics and target trainees is summarized in Table 5 below.

Table 5: Proposed capacity building activities

#	Training topic	Target group	Indicative Price
1	Setting up of community of practice and resource centers	Senior MPWRH staff, PCU staff, incl. E&S safeguard specialists, E&S focal points at the state level, and public works/ trade directorate staff on site. Staff at the Ministry of Environment and Climate Change	4-hour online course – 80-90 USD per person
2	Screening, review and clearance of E&S instruments.	PCU staff, incl. E&S safeguard specialists, E&S focal points at the state level, and public works/ trade directorate staff on site.	4-hour×3d online course – 80-90 USD per person

#	Training topic	Target group	Indicative Price
		Staff at the Ministry of Environment and Climate Change	
3	Environmental, social, OHS, in the transport and trade sector, awareness raising sessions, including road safety and compliance with WBG's EHSGs	Senior MPWRH staff, PCU staff, incl. E&S safeguard specialists, E&S focal points at the state level, and public works/ trade directorate staff on site.	4-hour online course – 80-90 USD per person 2-day Demonstration course – approx. 500 USD per group
4	Environmental and Social Impact Assessment (ESIA)- principles and requirements of WB's ESSs, comparison to available EIA regulations at the national level, E&S screening checklists Other topics will include on Sectoral Environmental and Social Assessment (SESA)	PCU staff, incl. E&S safeguard specialists, and E&S focal points at the state level Staff at the Ministry of Environment and Climate Change	4h×3d online course – approx. 200 USD per person
5	ESMP-Mitigation and monitoring measures, implementation and reporting	PCU staff, incl. E&S safeguard specialists, E&S focal points at the state level, and M&E staff, incl. Staff at the Ministry of Environment and Climate Change Third Party Monitors (TPMs), if any	4h×3d online course – approx. 200 USD per person
6	Risk communication and community engagement- stakeholder mapping/ public consultations according to WB requirements	Senior MPWRH staff, PCU staff, incl. E&S safeguard specialists, E&S focal points at the state level, and public relations staff Representatives of CBSs and NGOs	4-hour online course – 80-90 USD per person
7	GM- key requirements and principles, publicizing and public relations, managing GBV/SEAH related complaints, etc.	Senior MPWRH staff, PCU staff, incl. E&S safeguard specialists and public relations staff, E&S focal points at the state level, community leaders and partner CBSs and NGOs	4h×3d online course – approx. 200 USD per person
8	Procurement of services and goods (incl. tendering, proposal evaluation, contracting, managing contractors, national vs. WB procurement framework)	Senior MPWRH staff, PCU staff, incl. federal and state procurement specialists	4-hour online course – 80-90 USD per person
	Total		USD 500,000.00

Chapter 8 – Grievance Redress Mechanism

8.1 Objectives

141. In reference to ESS10 on Stakeholder Engagement and Information Disclosure, the Project has outlined key requirements of having in place a functional public Grievance Mechanism (GM) (see Project SEP) for addressing E&S concerns during the Project lifecycle. The main objective of a GM is to resolve complaints and grievances in a timely, effective and efficient manner that satisfies all parties involved. Specifically, it provides a transparent and credible process for fair, effective and lasting outcomes. It also builds trust and cooperation as an integral component of broader community consultation that facilitates corrective actions. Specifically, the GM will:

- Provide an effective avenue for aggrieved persons/ entities to express their concerns and secure redress for issues/complaints caused by the project activities and interventions.
- Promote a mutually constructive relationship among community members, PAPs, FGS, FMS, Somaliland, and the World Bank.
- Prevent and address community concerns.
- Assist larger processes that create positive social change; and
- Identify early and resolve issues that would lead to judicial proceedings.

This Grievance Mechanism is developed in alignment with the Project's Stakeholder Engagement Plan (SEP), which provides full procedural details, including specific protocols for grievance intake, escalation, timelines, recordkeeping, and reporting. The ESMF and SEP are fully aligned to ensure consistency in grievance management throughout the project lifecycle

8.2. GM Description

142. There is potential that the project may have some unintended consequences, e.g., risk of further exacerbating existing exclusion patterns or tensions between groups who feel they are under/misrepresented and undermine trust between citizens and government if transparency, equity and appropriate citizen engagement is not fostered. A GM will be developed which will enable the effective resolution of any grievances of the project stakeholders, including civil servants and communities where the transport and trade services will be provided. There will be confidential, appropriate mechanisms to deal with complaints regarding GBV/SEAH. There will also be a separate worker GM for the use of all direct and contracted workers to raise employment-related concerns in line with the provisions of ESS2. The Project will put measures in place to ensure that this worker GM is easily accessible to all Project workers. Social focal persons within the implementing partners will be trained in grievance handling, and resolution, including confidentiality requirements and whistle blower protection.

8.3. GM Setup and Process

143. A Grievance Redress Committee (GRC) consisting of the Project Manager, the social specialist and GBV specialist and other PCU staff as required, will be established at both levels of the Federation within 2 months of effectiveness, consisting of the project coordinator, and relevant staff, with the social safeguards' specialist acting as the secretary to the meeting and taking minutes and follow up the grievance resolution process. To avoid the risk of stigmatization, exacerbation of the mental/psychological harm and potential reprisal, the GM shall have different channels and protocols to enable a confidential and sensitive approach to GBV related cases that ensures the safety of survivors and enables survivor-centered care. The GRC will meet every two months throughout the project implementation period to review non-urgent appeals and the functioning of the GM and shall meet immediately when urgent issues arise. The social safeguards officers are responsible for noting critical trends emerging in the GM process such

as an increase/decrease in types of grievances to share with relevant project stakeholders as well as tracking complaints expressed on social media and whether and how these should be addressed, e.g., through improved communication and stakeholder engagement. Throughout this process, the social safeguards officers will receive support from the FGS MOPWRH's PCU and relevant project consultants. For serious complaints or those which may pose a risk to the project reputation, the FMS/BRA/SL social safeguards officer is expected to immediately inform the FGS safeguards specialist. Such complaints should be highlighted in the regular reports to the World Bank. In addition, the social specialist will ensure that the stakeholder engagement activities under the SEP include a communication strategy on the involvement of security or military personnel under the Project. There will also be robust stakeholder consultations with a range of actors are carried out for Somaliland before the implementation of activities.

144. The PCU will initially introduce all the staff and other project benefiting ministries and agencies about the GM of the Project and explain to them the procedures and formats to be used including the reporting procedures. Similarly, the PCU will also introduce the other stakeholders, including the project affected parties on GM and explain the procedures and Formats to be used including the reporting and submitting procedures. The grievances will be submitted in verbal, telephone, and writing, email to the assigned focal point under the PCU. Especial e-mail and a Toll-free No. have been created for it. The following contact details have been identified for running the GM.

Table 6: GM contact details

Contact details for the GM for the Project		
Name	Toll-free number.	Email address
Bashir Mohamed Ali	585	*cabasho.shiip@gmail.com)*

145. The complaint date, nature of the complaint, and date of the response will be recorded. It will be Ensuring that Affected community grievances are managed in a fair and timely manner. At the District level and FMS level, regular stakeholder meetings shall be conducted to receive feedback on the progress of project activities and interventions. A nodal person shall also be appointed at the FMS level in the Department under the Ministry of Public Works, Reconstruction and Housing to receive Grievances relevant to the project. The following Table 7 shows the proposed GM process and indicative timeline.

Table 7: GM proposed process and indicative timeline

#	Steps to address the grievance	Indicative timeline*	Responsibility
1	Receive, register and acknowledge complaint in writing. Serious complaints immediately reported to the Project Coordinator who will report to the World Bank. The GBV specialist will guide complaints related to SEAH.	Within two days	Social Safeguard specialist at FGS level and SS Officer at FMS/ SL level supported by PMTs.
2	Screen and establish the basis of the grievance. Where the complaint cannot be accepted (for example, complaints that are not related to the project), the reason for the rejection should be clearly explained to the complainant and where possible directed to the relevant department.	Within one week	SS specialist at FGS level and SS officer at FMS/SL level supported by PCU.
3	Coordinator and social specialist to consider ways to address the complaint, if required, in consultation with the Grievance Redress Committee (GRC) and, where appropriate, the complainant. At FGS level if a complaint	Within one week	Coordinator supported by PCU.

#	Steps to address the grievance	Indicative timeline*	Responsibility
	cannot be resolved at that level it should be immediately forwarded to the social specialist at FGS level.		
4	Implement the case resolution and provide feedback to the complainant.	Within 21 days	Coordinator with support from GRC.
5	Document the grievance and actions taken and submit the report to PMT.	Within 21 days	SS specialist and GRC supported by PMT
6	Elevate the case to the government judiciary system if complainant so wishes.	Anytime	The complainant
* If this timeline cannot be met, the complainant will be informed in writing that the GRC requires additional time.			SS specialist, GRC supported by PMT/consultant

8.4. GM Management and Alternatives

146. A log shall be maintained for all grievance and will be forwarded to the PCU under the MPWRH, and a summary shall be presented to the Technical Steering Committee (TSC) every three months. All grievances will be reviewed and redressed within 4 weeks from the registered date. If the project affected parties will not be satisfied, the resolution from the PCU and TSC can take Appeal to the national judiciary system. The national judiciary system is intended to handle and address the grievance from the project affected parties as immediately.

147. Also, the project-affected parties have an option to forward their grievance directly to the World Bank if the PCU and TSC cannot resolve their grievance through the following channels: (http://projects-beta.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service). A complaint may be submitted in English, , although additional processing time will be needed for complaints that are not in English. A complaint can be submitted to the Bank GRS through the following channels:

- By email: grievances@worldbank.org
- By fax: +1.202.614.7313
- By mail: The World Bank, Grievance Redress Service, MSN MC10-1018, 1818 H Street Northwest, Washington, DC 20433, USA

148. It is required that the affected parties select their representative(s) and provide contact details and must clearly state the adverse impact caused or likely to be caused by the Bank-supported project. The Affected parties submitted through the GRS are promptly reviewed to allow quick attention to project-related concerns this should be supported by available documentation. The affected parties may also indicate the desired outcome of the grievance.

149. Project-affected parties also have the option that may file the project-related grievances to the World Bank's independent Inspection Panel, which will then determine whether damage has occurred, or is likely to occur, as a result of the World Bank's non-compliance with its policies and procedures. The Project-affected may be submitted to the Inspection Panel at any time after concerns have been brought directly to the World Bank's attention, and after Bank Management has been allowed to respond. For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org.

Chapter 9 – Monitoring, Evaluation and Reporting

150. Adequate institutional arrangements, systems and resources will be put in place to monitor ESMF implementation. The goals of monitoring will be to measure the success rate of the activities, determine whether interventions have addressed negative impacts, and whether further interventions are required, or monitoring is to be extended in some areas. The goal of inspection activities is to ensure that sub-component activities and interventions comply with the plans and procedures laid out in the ESMF. The main monitoring responsibilities and inspection activities will be with the PCU, which will administer the overall project-related E&S monitoring and implementation as laid out in this ESMF, as well as the SEP and general GM. The PCU's E&S Specialist will be overall responsible for the implementation of the E&S mitigation measures, as well as for monitoring and inspections for compliance.

151. The E&S Specialists at the PCU and PMTs will handle the day-to-day tasks in regard to the implementation of the ESMF. The ESMF is the overall document that guides the development of site specific ESMPs. The ESMF lays out expectations for the Technical Leads who will be responsible for their own site/activity specific screening, impact assessments, development of site/activity specific ESMPs, monitoring of impacts, and administration of mitigation measures in line with their respective sub-component activities.

152. These activities may follow the internal processes of the Technical Leads, where applicable. They further commit to integrate stakeholder inputs into their regular monitoring and reporting activities. The PCU and PMTs E&S Specialists will assess the compliance of Technical Leads' activities against the ESMF and their subsequent ESMPs and will report any non-compliance to the PCU team and project coordinator. Indicators are identified in both documents and use as a baseline for assessing progress on implementation. The PCU will also independently conduct its own monitoring, verification and inspection of the activities of Technical Leads to ensure they are in compliance with this ESMF. Monitoring indicators will depend on specific activity contexts.

153. The World Bank will equally supervise and assess E&S performance through review of the quarterly monitoring reports. The GM will further help track complaints and the effectiveness of interventions, including those with E&S impacts. Table 8 presents the M&E plan, which is yet to be fully costed.

Table 8: ESMF M&E plan

Monitoring Activity	Description	Frequency / Timeframe	Expected Actions	Roles and Responsibilities	Cost
Track progress of ESMF implementation	Monitoring and reporting of ESMF implementation, with key results and issues presented to the PCU on a regular basis	Quarterly	ESMF requirements are completed for this Project	PCU Project Coordinator	TBD
Monitoring of ESMP implementation	Monitoring tools and through field visits by the E&S specialists and Quality enhancement and institutional strengthening partner. Contractor ESMP completion report and sign off by E&S	Quarterly	E&S specialists visit each site every 3 months Community contractor completion meeting for ESMP sign off	E&S specialists	Cost of field visits

Monitoring Activity	Description	Frequency / Timeframe	Expected Actions	Roles and Responsibilities	Cost
	specialist and community				
Development of targeted assessments and report, and management plan	Carried out in a participatory manner, targeted analysis of potential impacts, as well as identification and validation of management measures, drafted in participatory manner	In the 3 months following the Inception	Potential impacts are assessed with support of external consultants and participation of project team and stakeholders; targeted assessment report completed	E&S specialists and Project Coordinator	TBD
Implementation of management measures and monitoring of potential impacts identified in targeted assessments	Permanent and participatory implementation and monitoring of management measures, in accordance with findings of targeted assessments	Continuous, once assessment is complete and management plan in place	Implementation of stand-alone management plans; participatory monitoring; integration of management plans into project implementation strategies	Project Coordinator, E&S Safeguards Specialists	TBD
Learning	Knowledge, good practices and lessons learned regarding social and environmental risk management will be captured regularly, as well as actively sourced from other projects and partners and integrated back into the project	At least annually	Relevant lessons are captured by the project teams and used to inform management decisions	Project Coordinator, E&S Safeguards Specialists	TBD
Review and make course corrections	Internal review of data and evidence from all monitoring actions to inform decision making	Quarterly	Performance data, risks, lessons and quality will be discussed by the project's TSC	Project Coordinator, E&S Safeguards Specialists	TBD
ESMF implementation review	The TSC will consider updated analysis of risks and recommended risk mitigation measures at all meetings	Quarterly	Any risks and/ or impacts that are not adequately addressed by national mechanisms or project team will be discussed in project steering committee. Recommendation	PCU, Project coordinator and E&S safeguards specialist	TBD

Monitoring Activity	Description	Frequency / Timeframe	Expected Actions	Roles and Responsibilities	Cost
			s will be made, discussed and agreed upon.		

154. Management of change. Change Management as a discipline that complements Project Management and exists to address people-oriented changes that impact on a project during implementation. Good Change Management will deepen and quicken adoption, maximize sustainability and therefore enable better return on investment. Typically, there are six components of Change Management[19]: Leadership Alignment, Stakeholder Engagement, Communication, Change Impact and Readiness, Training, and Organization Design, which need constant review and adjustment.

155. Update the ESMF: This ESMF will be used for screening of sub-projects and as a guide for the preparation, review, and approval of environmental assessment instruments (ESIA and ESMP). It will also be a reference in the implementation of the sub-projects and their respective ESMPs. Since there may be new developments, guidelines or national legislations issued after its (EMF) approval and posting on the World Bank website, the EMF may need to undergo updating from time to time. Updating this document is also required when the sub-projects and project structures are firmed up.

9.1 Disclosure of Environmental and Social Risk Management Instruments.

1. The SHIIP Stakeholder Engagement Plan seeks to define a structured, purposeful, and culturally appropriate approach to consultation and disclosure, in accordance with ESS 10. The FGS recognizes the diverse and varied interests and expectations of project stakeholders and seeks to develop an approach for reaching each of the stakeholders in the different capacities at which they interface with the project. The aim is to create an atmosphere of understanding that actively involves project-affected people and other stakeholders leading to improved decision making. Overall, SEP serves the following purposes:
    i. Stakeholder identification and analysis.
    ii. Planning engagement modalities through effective communication, consultations, and disclosure.
    iii. Enabling platforms for influencing decisions.
    iv. Define roles and responsibilities for the implementation of the SEP.
    v. Define reporting and monitoring measures to ensure the effectiveness of the SEP and periodical reviews of the SEP based on findings. vi. defining role and responsibilities of different actors in implementing the Plan; and
    vi. Elaborating the role of grievance mechanism (GM)
2. Copies of this ESMF and other safeguard instruments developed later (ESMPs), prepared for the sub-projects to be financed under the project, should be disclosed in compliance with relevant country regulations and the World Bank Environment and Social Standards. The ESMF will continue being disseminated within Somalia in all project sites. The executive summary will also be made available into Somali language and disclosed in two daily newspapers for 21 days, or as required by country laws, while the World Bank will post the approved document at WB's official website.

[19] https://www.r10.global/blog/6-components-of-change-management-to-set-you-up-for-success

Chapter 10 – Indicative Budget for ESMF

156. An indicative budget (of US$342,650) has been provided, Table 9 below, meant to cover safeguards related expenses such as capacity building programs, coordination and public consultation meetings, planning workshops, monitoring work, and environmental consultancy services.

157. This estimated budget does not include the cost for mitigation and enhancement measures, which will be integrated into the construction cost. All administrative costs for the operation of the PCU are included in the overall Project's cost.

Table 9: Indicative Budgetary requirements for implementing the ESMF

ESMF Requirements	Budget basis and assumptions	Total Cost (US$)
Capacity Building for PCU Personnel and district staff	Training programs held in-country (all in one year)	50,000
Meetings, Workshops and Stakeholder Engagement	For 30 persons/year x two workshops	4,000
Field visits to Project locations	Field visits are estimated for two PCU personnel per year (to cover, transport, and daily allowances)	Already in PCU budget
Sub-Project Scoping Workshops	One-day ESIA/ESMP Scoping workshop for major roads, trade centers, and ports	*Budget as part of ESMP preparation* (7,000)
Typical ESMP Report for sub-projects	Assume average cost of each ESMP, 25 days	*Budget as part of ESMP preparation* (40,000)
Typical Stakeholder Engagement for sub-project	Assume average cost of each ESMP, 10 days	*Budget as part of ESMP preparation* (10,000)
Engagement of temporary environmental and social assistants	Allow for five assistants, 10 days each plus expense	*Budget as part of ESMP preparation* (50,000)
Monitoring Compliance with ESMP during pre-operations activities	Assume quarterly monitoring activities over five days, each quarter, per year (two persons plus logistics, per diem etc.)	*Budget as part of ESMP preparation* (30,000)
Monitoring Compliance with ESMP and during operations	Assume quarterly monitoring activities over five days, each quarter, per year (one person plus logistics, per diem, etc.)	*Budget as part of ESMP preparation* (20,000)
Salaries	E&S /GM/GBV Focal Points, PIUs (FMS).	350,000
Budget for implementation of SEP	All activities related to the implementation of the SEP (contractors SEPs will be included in the contract amount).	120,000
Implementation of GBV action plan	All activities related to the implementation of the GBV action plan.	400,000
Contracting risk management firm to conduct project security	An internationally certified security risk management firm will be contracted for the assignment based on key qualifications.	400,000

risk assessment and management plans		
Sub-total	Includes 15% contingency	*211,000 + 31,650*
Administrative Costs – FGS, FMSs, and SL	Administrative expenses incurred by the central coordination and PMTs for the project	*100,000*
TOTAL Estimated Budget		342,650

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Annexes

Annex 1 – Description of Primary Road Corridors

	Route	*Road Type*	*KM*	*Regional Connectivity*	*States*	*Main Section of the corridor*	*Related HoA Corridors*	*Ongoing Interventions*
1	*Mogadishu-Afgoye-Baidoa-Beled Hawo/Doolow*	*International Corridor + Interstate trunk road*	*564*	*North to South + Kenyan and Ethiopian border linkage*	*BRA[20], SW[21],JL[22]*	• *Mogadishu-Afgoye (30km) SW* • *Afgoye-Baidoa (217km) (SW)* • *Baidoa-Gasomane (Awdiinle)(80km) SW* • *Gasomane (Awdiinle)-Luuq-(82km)-Doolow (72) (JL)* • *Luuq-Dolow Junction to BeledHawo (83km) (JL)*	*Mogadishu Corridor (Mogadishu, Mandera, Filtu, Awasa, Addis Abbeba)*	• *Mogadihsu-Afgoye (30km)* *Qatar Government* • *Luuq-Doolow (85km) Earth Road AfDB*

The Mogadishu-Baidoa-Beled Hawo/Doolow corridor links two member states in Somalia (Southwest State of Somalia and Jubaland) and Banaadir Regional Administration (BRA), and the two largest cities in Southern Somalia (Mogadishu and Baidoa) thereby playing a pivotal role in promoting the unity of the country through interconnectivity, trade, and movement of people between the regions. The corridor originates at the capital city and main maritime gateway of the country, Mogadishu. It crosses Baidoa, an important economic center and capital of the Bay region, and links to neighbouring Ethiopia and Kenya through a major trade route that has long been utilized for both imports and exports of the hinterland.

The corridor between Mogadishu and Beled Hawo/Doolow (through Baidoa) (564km) is an important trade route but the road infrastructure is deteriorated and needs immediate upgrading and rehabilitation.

[20] BRA = Banaadir Regional Administration (Mogadishu)
[21] SW = Southwest State of Somalia
[22] JL = Jubaland State of Somalia

	Route	Road Type	KM	Regional Connectivity	States	Main Section of the corridor	Related HoA Corridors	Ongoing Interventions
Existing roads are paved/bituminous surface linking mainly to Baidoa have not been maintained and are well past their design life. Vehicle speeds are estimated to be low at these roads that should be highways, averaging 30km/h-60km/h. This means that travel takes a long time with higher costs of public and private transport, leading to increased passenger fares, higher costs of goods in the market, and goods being taken to/from markets.								
2	*Mogadishu-Afgoye-Merca -Kismayo-Doobley Road*	*International corridor +Interstate trunk road*	*690*	*North to South + Kenyan border linkage*	*SW, JL*	• *Mogadishu -Afgoye (see row one).* • *Afgoye-Marca-Barawe-Haramka (260KM) (SW)* • *Haramka-Jamame-Kismayo(200km)-Dobley (230) (JL)*	*N/A*	
This corridor originates at the capital city and main maritime gateway of the country, Mogadishu and connects towards the South the Banadir Region to the Jubaland State of Somalia. Located almost half-way between Mogadishu and Kenyan border along the shoreline of Indian ocean, Kismayo is the third largest city in southern Somalia after Mogadishu and Baidoa. It is one of the most diverse cities in Somalia and its port is an important maritime gateway managed by the Jubaland Administration. **The market of Dhobley is located 245 km from the port town of Kismayo, 90 km from the Dadaab refugee camp and 198 km from the Garissa livestock market in Kenya. It is an active market transacting both formal and informal trade for livestock, food, and other general commodities that are also moved from Somalia into Kenya, mainly targeting the Dadaab refugee camp. The Kenyan side of the market is called Liboi. Dhobley is situated in the south inland pastoral livestock zone (camel, cattle, Sheep and Goats). It is active market transacting both formal and informal trade for livestock, food and other general commodities.**							

	Route	*Road Type*	*KM*	*Regional Connectivity*	*States*	*Main Section of the corridor*	*Related HoA Corridors*	*Ongoing Interventions*
Dhobley is a small town that borders Liboi and Dajabula towns in North Eastern Province of Kenya. The first town that was liberated from Al-Shabab control in Lower Jubba, Dhobley has enjoyed relative peace and stability since 2011, enjoying a growth rate that is faster than any other town in Lower Jubba. Equally, as a strategic border point, refugees fleeing from other parts of Lower Jubba as well as those returning from Kenyan refugee camps to their homeland have either temporarily settled in or transited through Dhobley town. The opening of the airstrip in 2018 has played a major role in providing a relative boost to the economy, bolstering the town's status as a business hub in the region.							
3	*Mogadishu-Jowhar-Beledweyne (including Feer-Feer)-Galkayo* *(including the link from Bandiradley and Abud-wack to Ethiopian border*	*Interstate trunk road + International Corridor*	*781*	*East to West + Ethiopian Border Linkages (Feer-Feer)*	*BRA, HS[23], GM[24]*	• *Mogadishu-Jowhar (90KM) BRA/HS* • *Jowhar-Beledweyn (250km)-Mataban (86km)(including, link Feer-Feer)(20km) (Total HS=386km)* • *Mataban-Dhusamareb(95km)-Adado (78km)-Galka'yo (132km) (Total GM = 305km)*	*Mogadishu Corridor (Mogadishu-Ferfer-Awassa-Addis Abeba)*	• *Mogadishu-Jowhar (90km)Qadar Government* • *Beledweyn-Kalabeyr (22km) AfDB.* • *Dhusamareb-Adado (60km) AfDB*
The Mogadishu-Beledweyne (including Feer-Feer)-Galkayo corridor is an international corridor and an important interstate trunk road linking three member states (Banadir, Hirshabelle and Galmudug) and linking the capital city of Mogadishu to the important cities of Beledweyne and Galkayo, and through a branch road, to the Feerfeer border town with Ethiopia.								

[23] HS = Hiirshabele State of Somalia
[24] GM = Galmudug State of Somalia

	Route	*Road Type*	*KM*	*Regional Connectivity*	*States*	*Main Section of the corridor*	*Related HoA Corridors*	*Ongoing Interventions*
Beledweyne is located in central Hirshabelle State and is the capital of Hiiraan region. The town is strategically situated on the Shabelle river 340 kms north of Mogadishu and 50 kms to the Ethiopian border. Beledweyne has strategic importance because it is located in the center of the main road that crosses the country and connects the North and South of the country through Mogadishu to the rest of the central and the northern regions. Beledweyne has several markets that provide specific products or services. Furthermore, the district is a major source of agricultural produce and this is the primary earner of income for most of the local population. **Galkayo is the capital of Mudug central Region of Somalia; it links the southern part to the northern regions of the country. The main road from the capital Mogadishu passes through the town of Galkayo. Galkayo itself is divided into two Administrative Authorities, the north is under the Puntland state administration and the south of the town is governed by Galmudug. Therefore, Galkayo is well located in a strategic central point, which provides the vital commercial lifeline between southern and northern regions including the rest of the country. Currently this road is mainly used for transporting livestock to the Port of Bossaso in Puntland. The link from Bandiradley (46km) and Abud-wack (47km) to Ethiopian borders are also a main importance for the trade transport and mobility between the areas of the both countries.**							
4	*Berbera-Burco (including connection to Buhotle)-Las'Anod-Garowe Road*	*Interstate trunk road + International Corridor*	*595*	*North to South + Ethiopian Border Linkages*	*SL[25], PL[26]*	• *Berbera-Bur'o-Las'Anod-385km (SL)* • *Las'Anod-Garowe (132km) (PL)* • *Buhotle link (78km)*	*N/A*	
The Berbera-Burco-Las'Anod-Garowe corridor has two main functions: it is the primary import route to the major towns of Burco and Las'Anod, and it is an important interstate route connecting Puntland capital city Garowe to Somaliland main cities and main port Berbera. The route is also a part of existing North-South connection. The road is paved until Las'Anod but requires heavy rehabilitation works. The Las'Anod-Garowe connection has been identified as a strategic project by the Somaliland and Puntland administrations.								

[25] SL = Somaliland
[26] PL = Puntland state of Somalia

	Route	Road Type	KM	Regional Connectivity	States	Main Section of the corridor	Related HoA Corridors	Ongoing Interventions
5	*Berbera-Hargeisa-Wajale*	*International Corridor*	*250*	*North to South + Ethiopian border linkage*	*SL*	• *Berbera-Hargeisa-Wajale (250) (SL)*		• *UAE Berbera Corridor investment (250km)*
This international corridor is an important trade route that has the potential of competing with the Doraleh corridor as major import and export route for Ethiopian trade. The road has long served as a major transit road for goods destined to Ethiopian markets, but also as an export road for Ethiopian products. The potential growth of trade along the corridor has triggered major investments in the port of Berbera and on the road infrastructure. The first section of 27km of the road from Berbera has been upgraded into a highway and inaugurated in 2020. Additional investments by DPs are planned. **In addition, the road is the most travelled road in Somaliland linking Berbera to the capital city of Hargeisa (157km) and then Hargeisa to Togwajale in the border (92 km) to Ethiopia.**							
6	*Bosaso-Garowe-Galka'yo-(including Connection to Galdogob)*	*Interstate trunk road + International Corridor*	*740*	*North to South + Ethiopian border linkage*	*PL, GM*	• *Bosaso-Qardho (210km)* • *Qardho-Garowe (215km)* • *GaroweGalka'yo (240km)* • *Galka'yo-Galdogob(75km) (*	*Bosaso Corridor (Bosaso-Galka'yo-Galdogob-Kebri Dehar)*	• *Garowe – Galka'yo (??) EU/GIZ* • *Garowe-Galka'yo (85km) AfDB* •

	Route	*Road Type*	*KM*	*Regional Connectivity*	*States*	*Main Section of the corridor*	*Related HoA Corridors*	*Ongoing Interventions*
The Bosaso-Garowe-Galka'yo corridor is the main corridor of the Puntland region, linking the main port of the region to the capital city Garowe and to the hub town of Galkayo connecting Puntland to Mudug. **Galkayo is the capital of Mudug central Region of Somalia; it links the southern part to the northern regions of the country. It is divided into two Administrative Authorities; the north is under the Puntland state administration and the south of the town is governed by Galmudug. Therefore, Galkayo is well located in a strategic central point, which provides the vital commercial lifeline between southern and northern regions including the rest of the country. Currently this road is mainly used for transporting livestock to the Port of Bossaso.** **Galkayo links Bossaso with the Central and Hiran regions as all these regions mainly depend on goods imported through Bossaso Port. The road between Bossaso and Galkayo is in fair condition. It is approximately 750 km long and has been recently rehabilitated by Puntland administration. The border town of Galdogob links Ethiopia to Somalia and is one of the main export routes for livestock exported through Bosaso. The Galka'yo-Galdogob road is not paved.**							
7	*Lowya'ade-Borama - Togwajale-Hargeisa-Burao*		*581*	*North to South + Djibouti border linkage*	*SL*	• *Lowya'ade-Borama -Togwajale-Hargeisa-Burao (581) (SL)*		*TBD*
Lowyadde – Borama-Hargaisa – Burao is part of the Djabouti Somalia corridor. from Hargeisa the road goes via Berbera to Burao, which doubles the distance. The connection between Hargeisa directly to Burao reduces halve the travel time and enhances the connection to further North-East and South of the country.								

	Route	*Road Type*	*KM*	*Regional Connectivity*	*States*	*Main Section of the corridor*	*Related HoA Corridors*	*Ongoing Interventions*
8	*Kismayo-Elwak*		*449 (est.)*	*East to West + Kenya border linkage*	*JL*	• *Kismayo to Afmadow(151km)(JL)* • *Afmadow – Elwack (Kenya Border) (298) (JL)*	*Kismayo Corridor (Kismayo - Elwak Mandera Awasa Addis Abeba)*	
The Kismayo-Elwak corridor is an alternative supply route to Northern Kenyan regions to the Mogadishu corridor. It connects the Jubaland State of Somalia to the border area between Kenya and Somalia that is an active trade area for the regional populations. It has the potential of growing into a major trade route and HoA corridor. The road is currently impassable during the rainy seasons and is not paved beyond the first sections from Kismayo.								
Total			*4,650 KM*					

Annex 2 – National Framework

The Provisional Constitution of the Federal Republic of Somalia

158. Article 10 – Human Dignity: Human dignity is the basis for all human rights. It is inviolable and must be protected by all. The State power must not be exercised in a manner that violates human dignity.

159. Article 11 – Equality: All citizens, regardless of sex, religion, social or economic status, political opinion, clan, disability, occupation, birth or dialect shall have equal rights and duties before the law. The State must not discriminate against any person on the basis of age, race, color, tribe, ethnicity, culture, dialect, gender, birth, disability, religion, political opinion, occupation, or wealth. Thus, all laws, or political and administrative actions that are designed to achieve full equality for individuals or groups who are disadvantaged, or have suffered from discrimination in the past, shall be deemed to be not discriminatory.

160. Article 12 of the Constitution addresses public assets and natural resources. Art. 11 provides that all citizens have equal rights regardless of sex, and that the State must not discriminate against any person on the basis of gender. Article 14 stipulated that a person may not be subjected to slavery, servitude, trafficking, or forced labor for any purpose. Art 15. Prohibits Female Genital Mutilation (FGM).

161. Article 24 – Labor Relations: Every person has the right to fair labor relations. All workers, particularly women, have a special right of protection from sexual abuse, segregation and discrimination in the workplace. And, every labor law and practice shall comply with gender equality in the workplace. Article 24.5 stipulated that all workers, particularly women, have a special right of protection from sexual abuse, segregation and discrimination in the workplace. Every labor law and practice shall comply with gender equality in the workplace.

162. Article 25 states that every Somali has the right to an environment that is not harmful to them, and to be protected from pollution and harmful materials. Every Somali has a right to have a share of the natural resources of the country, whilst being protected from excessive and damaging exploitation of natural resources.

163. Article 26 (section 1 and 2) state that a) every person has the right to own, use, enjoy, sell and transfer property, b) the state may compulsorily acquire property only if doing so in the public interest, c) any person whose property has been acquired in the name of public interest has the right to just compensation form the State, as agreed by the parties or decided by a court.

164. Article 32 – Right of Access to Information: Every person has the right of access to information held by the state, and the right of access to any information that is held by another person which is required for the exercise or protection of any other just right.

165. Article 43 provides guidelines on environmental and social safeguards that can be observed. Article 43 further states: a) land is Somalia's primary resource and the basis of the people's livelihood.; b) land shall be held, used and managed in an equitable, efficient, productive and sustainable manner, c) the FGS shall develop a national land policy, which shall be subject to constant review, d) no permit may be granted regarding the permanent use of any portion of the land, sea or air of the territory of the Federal Republic of Somalia, e) the FGS, in consultation with the FMS and other stakeholders, shall regulate land policy, and land control and use measures.

166. Article 45 states that the Government shall give priority to the protection, conservation, and preservation of the environment against anything that may cause harm to natural biodiversity and the ecosystem. Furthermore, all people have a duty to safeguards and enhance the environment and participate in the development, execution, management, conservation and protection of the natural resources and the environment. The FGS and the governments of the FMS affected by environmental damage shall take urgent measures to clean up hazardous waste dumped on the land or in the waters of the FGS; take necessary measures to reverse

desertification, deforestation and environmental degradation, and to conserve the environment and prevent activities that damage the natural resources and the environment of the nation, among other measures.

167. Article 111J – The Office of the Ombudsman: The office is protected against interference from any other person or entity. As such, independence, integrity and effective service delivery are also maintained. The Ombudsman shall: (i) Investigate complaints against government workers regarding: allegations/ outright violations concerning basic rights and freedom, abuse of power, unfair behavior, mercilessness, lack of clemency, indiscipline or disrespect, corruptive act, illegal behavior, or those that could lead to mischief or injustice; (ii) Investigate complaints in relation to the activities of the Public Service Commission and other administrative institutions of the government, including defense and police forces that could lead to unequal services, unfair recruitment, or administration; (iii) Take appropriate steps to rectify or change items mentioned in earlier clauses through a fair, and appropriate process of consultations and sacrifices among the people concerned; (iv) Report on the complaints and issues raised and submit to the head of the offender; (v) Forward cases to the Attorney General and bring them before a court, as appropriate.

168. Article 111H – National Security Commission: A National Security Commission shall be established to study and develop an integrated security framework to address present and future needs of Somalia. It shall present proposals to ensure that human security is prioritized and incorporated into such a framework, through which the public may provide oversight and monitor security related expenditure and seek redress from abuses by security personnel.

Legislation and Policies on the Environment and Social Sectors

169. The Ministry of Environment is also drafting the regulations of operationalization and implementation of the environmental legal framework, the process of drafting the Environmental and Social Impact Assessment Regulation, together with the Environmental and Social Audit, is underway. Other relevant regulatory frameworks include National Climate Change Policy 2020, Draft National Charcoal Policy, Draft National Forest Management Policy, and Draft Ozone Layer Protection Regulation. In addition to that, there are other sectoral policies, acts and regulations relevant to the labor, water, livestock, agriculture, petroleum, fishing and marine resource sectors.

170. Somalia National Environment Policy: The Somali Cabinet, on February 13, 2020, approved the National Environmental Policy. The stated goal of environmental policy is to improve the health and quality of life of the Somali people. The development of this policy was backstopped by the Global Environment Facility (GEF) and the United Nations Development Program (UNDP). This is the first time that an environmental policy has been developed and taken to Cabinet level for approval, since the collapse of the previous central administration in 1991.

171. In November 2020, an Environmental Impact Assessment Bill was approved by the Somali cabinet and sent to parliament for ratification. The Directorate is also the operational focal point for multilateral environmental agreements and funds, such as GEF, and Green Climate Fund (GCF). It is also tasked with conducting Sectoral Environmental Assessments, Environmental Impact Assessments (EIAs) and EAs, although at present there is no enabling legislation or regulations in place, other than the aforementioned Impact Assessment Bill.

172. Environmental and Social Impact Assessment Regulations of 2021 (draft). The Somali authorities have since moved to give effect to the aforementioned Environmental Assessment Bill of 2020. As of March 2021, the Ministry of Environmental has published draft environmental and social impact assessment (ESIA) regulations. These regulations will need to be adhered to by the contractors working for the Project.

173. The Waste Management Framework is tackled under the country's Water, Sanitation and Hygiene (WASH) policy, which mandates the Ministry of Energy and Water Resources to put a national waste management law (not developed yet). However, the responsibility for

enforcement of law and further development of regulations are attached to the relevant municipalities according to their jurisdictions.

174. The WASH policy states that: "All people in Somalia will have safe and sufficient water, hygiene and sanitation. The vision of the policy is to create a country where everyone has access to safe drinking water, everyone uses sanitary latrines and all the villages are Open Defecation Free (ODF), practices appropriate hygiene behavior at home, in schools and in the wider community. The national WASH policy embodies the commitment of the Government to improve the quality of life of Somali population. The Policy envisions enabling Somali people to have access to adequate and safe water, hygiene and sanitation for all. Our vision is rooted in the belief that access to safe water supply and sanitation for all will help alleviate poverty through improved health, productivity and income. The Policy provides the framework for WASH sector partners and concerned Ministries to implement WASH-related programs and calls for universal access to Water Supply and Sanitation to achieve the Sustainable Development Goals (SDGs)."

175. Occupational Health and Safety (OHS). Legislation on OHS in Somalia is limited, with the labor code known as Act No. 31 of 2004: Private Sector Act[27] as the main reference on OHS issues. This law addresses hours of work, holidays and rest periods, employees' pay and emoluments, contracts, recruitment procedures, etc., but does not directly address OHS concerns. Instead, the Labor Code establishes the general rights, duties and responsibilities of the parties of labor relations, as well as conditions for ensuring the safety and health of workers.

176. The revised draft Somalia Labor Code[28`] has more emphasis on OHS requirements. It makes the Director of OHS responsible for the registration of hazards and risks, regulation and supervision of all workplaces and monitoring or enforcing compliance with the Labor Code and any other labor law to the extent that they regulate safety, health and welfare in the workplaces. Part VI of the Revised Draft Labor Code covers the administration of occupational accidents, injury and disease provisions at workplace, employer's general duties towards to OHS, insurance requirements, employees' general duties, medical support, compensations, offenses, and penalties, etc.

177. The Labor Code covers protection against risks to workers, notification procedures in occupational accidents, medical requirements at site and conveyance of injured workers to hospitals, among others. Below is the list of relevant provisions of the Labor Code with regard to OHS.

178. The Labor Code stipulates that all employment contracts must include provisions on: a) the nature and duration of the contract; b) the hours and place of work; c) the remuneration payable to the worker; and d) the procedure for suspension or termination of contract. Furthermore, all contracts must be submitted to the competent Labor Inspector for pre-approval. With regards to OHS standards, the employer is obligated to provide adequate measures for health and safety, protecting staff against related risks, including provision of a safe and clean work environment and of well-equipped, constructed and managed workplaces that provide sanitary facilities, water and other basic tools and appliances ensuring workers' health and safety.

179. The Code further stipulates that Somali workers have the right to submit complaints and the employer must give the complaints due consideration. Remuneration must be adequate in view of the quality and quantity of the work delivered, and must be non-discriminatory with regard to age, gender and other aspects. Maximum number of working hours per week are 8 hours per day and 6 days per week. Some work is considered dangerous and unhealthy, and forbidden for women and youth (defined as 15-18 years of age). This includes the carrying of heavy weights or working at night. More details on the labor code are provided in the updated LMP for this Project.

180. The Labor Code further forbids work for children below the age of 12 but allows employment of children between the ages of 12-15, but employment has to be compatible with proper

[27] Referred to in Somali as "Wax ka Bedelka iyo Kaabista Xeerka Shaqaalha Rayidka (Xeer Lam 32/2004)"
[28] Under development in a process that includes the International Labor Organisation

protection, health and the moral of children. The Code also recognizes freedom of association. Employers are prohibited from engaging in any kind of discrimination or restriction of the right of freedom of association. Workers are allowed to join trade unions. Further, the Labor Code stipulates the right to equal pay for the same work and women are entitled to 14 weeks of maternity leave at half pay.

181. The Somali Penal Code of 1962 criminalizes rape and other forms of sexual violence as well as forced prostitution. Articles 398-9 provide that 'carnal intercourse' and 'acts of lust committed with violence' are punishable with 5-15 years and 1-5 years of imprisonment, respectively. Abduction for the purpose of lust or marriage is prohibited under Art 401. The Family Code of 1975 sets the minimum age for marriage at 18 years for males and females. Females between the age of 16 and 18 can marry with their guardian´s consent. Marriage is based on equal rights and duties. However, under this project, age of employment shall be 18 years in compliance to the ESF requirement

Gender and Ombudsman in Somalia

182. Somalia National Gender Policy (2016) includes strategies to eradicate harmful traditional practices such as female genital mutilation/cutting (FGM/C) and child marriage and to improve services for the management of GBV/SEAH cases.

183. Office of the Somali Ombudsman. It is stipulated that the office shall become functional at the FGS level. This office will serve to investigate complaints regarding allegations or outright violations against basic rights and freedoms, abuse of power, unfair behavior, mercilessness, lack of clemency, indiscipline or disrespect towards a person that lives in Somalia by an officer who works at the various levels of government, an apparently unfair behavior, or act in a corrupt manner, or a behavior by an officer deemed as illegal by a democratic society or regarded as mischief or injustice.

184. The Ombudsman shall also investigate complaints in relation to the activities of the Public Service Commission of the government, administrative institutions of the government, and the defense and police forces whoever such complaints relate to, failure to equally align those services or fair recruitment among all people in those services or to administer those services fairly. In addition, the office will take appropriate steps that the public calls for, to rectify or change items mentioned in earlier clauses through a fair, and appropriate process, which include, but are not limited to: (a) consultations and sacrifices among the people concerned; (b) reporting on the complaints and matters presented to the Ombudsman, and submit to the head of the offender; (c) to forward the matter to the Attorney General; and (d) to bring the matter before a court that forbids improper conduct by an officer.

National Security Commission

185. A National Security Commission is established courtesy of federal law (Article 111H). The National Security Commission is an independent entity that comprises security experts from all sectors. The mandates of the National Security Commission include:

- Study and develop an integrated security framework to address the present and future needs of Somalia for review and adoption by the Federal Parliament;
- Present proposals to ensure that human security is prioritized and incorporated into the national security framework.
- Develop a framework through which the public may provide oversight and monitor security related expenditure; and
- Seek redress from abuse by security personnel.

Annex 3 – International Frameworks

Basel Convention – ratified by Somalia in 2010

186. The Basel Convention on the Control of Transboundary Movement of Hazardous Wastes and their Disposal was adopted on 22 March 1989, by the conference of plenipotentiaries in Basel, Switzerland. The convention is an international treaty that was designed to reduce the movements of hazardous waste between nations, and specifically to prevent transfer of hazardous waste from developed to less developed countries. It does not, however, address the movement of radioactive waste. The convention is also intended to minimize the rate and toxicity of waste generated, to ensure their environmentally sound management as closely as possible to the sources of generation, and to assist less developed countries in environmentally sound management of the hazardous and other wastes they generate.

Stockholm Convention – ratified by Somalia in 2010

187. The Stockholm Convention on Persistent Organic Pollutants (POPs) is a global treaty that aims to protect human health and environment from the effects of POPs. The convention entered into force on Monday 17, 2004. POPs are those substances that are toxic, have the potential to accumulate in unhealthy quantities in humans and animals, and are stable and thus resistant to natural breakdown, as well as can be transported over long distances through the atmosphere and oceans. POPs have been shown to adversely affect human health and environment. They have been linked to cancer, damage to the nervous system, reproductive disorders, and weakening of the immune system. The convention, which currently regulates 29 POPs, requires to adopt a range of control measures to reduce and, where feasible, eliminate the release of POPs. The convention prohibits the production, unintentional production, and trade of such substances, and requires parties to develop national action plans to address release and to apply "best available techniques" to control them. The convention also aims to ensure the sound management of stockpiles and wastes that contain POPs.

International Labor Standards

188. Somalia has signed and ratified a number of key International Labor Organization (ILO) conventions including the Occupational Safety and Health Convention, 2003 (No. 155) ratified in April 2021, C155 aims to prevent accidents and injury to health arising out of, linked with or occurring in the course of work, by minimizing, so far as is reasonably practicable, the causes of hazards inherent in the working environment (Article 4). Working spheres, under which this convention applies include design, testing, choice, substation, installation, arrangement, use and maintenance of the material elements of work (workplace, working environment, tools, machinery and equipment, chemical, physical and biological substances and agents, work processes), Article 5.

189. Other conventions include Forced Labor Convention, 1930 (No.29); Abolition of Forced Labor Convention, 1957 (No. 105); Discrimination (employment and occupation) convention, 1958 (No. 111); Worst forms of child labor convention, 1999 (No. 182); Violence and Harassment Convention, 2019 (No. 190); and Protection of Wages Convention, 1949 (No. 95).

3.7. The World Bank's Environmental and Social Framework

190. The project is principally governed by the ESF29 of the World Bank 2018. The World Bank is committed to support Borrowers in the development and implementation of projects that are environmentally and socially sustainable, and to enhancing capacity of Borrowers' environmental and social frameworks to assess and manage the environmental and social risks and impacts of projects. Therefore, the Bank has defined specific ESSs, which are designed to avoid, minimize, reduce or mitigate the adverse environmental and social risks and impacts of

[29]Full text is available on http://pubdocs.worldbank.org/en/837721522762050108/Environmental-and-Social-Framework.pdf#page=59&zoom=80

projects. In total, 10 ESSs form an integral part of the WB's ESF, however, only relevant ESSs are presented below:

191. ESS1 – Assessment and Management of Environmental and Social Risks and Impacts: ESS1 sets out Borrower's responsibilities for assessing, managing and monitoring environmental and social risks and impacts associated with each stage of a project supported by the WB, in order to ensure that the Project is environmentally and socially sound and sustainable. By this ESS, the Borrowers is required to conduct environmental and social assessments proportionate to the risks and impacts, and consistent with Environmental and Social Standards of the WB's ESF. Additionally, the Borrower is required to manage environmental and social impacts throughout the project cycle, in a manner proportionate to the nature and scale of potential risks and impacts.

192. ESS2 – Labor and Working Conditions: ESS2 aims to promote safety and health at work, fair treatment, nondiscrimination and equal opportunities of project workers, provide protection to project workers, including vulnerable workers, prevent the use of all forms of forced and child labor, support principles of freedom of association and collective bargaining, as well as provide project workers with accessible means to raise workplace concerns. ESS2 defines project workers as a project employment relationship that includes direct workers, contracted workers, primary supply workers, and community workers. It also requires the borrower to:

- Develop and implement written Labor Management Procedures (LMPs) that set out clear and understandable employment terms and conditions, ensure employing and treating project workers done in a nondiscriminatory and equal opportunity manner, ensure measures to prevent and address harassment, intimidation and/or exploitation, encompassing workers of vulnerability characteristics, and ensure right of workers to form and to join workers' organizations according to applicable national laws;
- Protect the workforce (of the project) against child labor and ensure minimum age requirements are met. The standard defines minimum age employment as 18, and explains conditions where a child under minimum age could be employed, however, employment is not allowed in either case, if working conditions are hazardous, interfere with child's education or be harmful to the child's health or physical, mental, spiritual, moral or social development. Additionally, no trafficked persons to be employed in connection to the project; and
- Provide grievance mechanism for all project's direct and contracted workers to raise workplace concerns, which should be proportionate to the nature and scale of the potential risks and impacts of the project.

193. ESS3 – Resource Efficiency and Pollution Prevention and Management: ESS3 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. The current and projected atmospheric concentration of greenhouse gases (GHG) threaten the welfare of current and future generations. At the same time, more efficient and effective resource use, pollution prevention and GHG emission avoidance, and mitigation technologies and practices have become more accessible and achievable. This ESS sets out the requirements to address resource efficiency and pollution prevention and management throughout the project life cycle consistent with Good International Industry Practice (GIIP).

194. ESS4 – Community Health and Safety: ESS4 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. ESS4 puts emphasis on community exposure to risks and impacts of a project. This includes road safety risks, and risks associated with security personnel. ESS4 requires Borrowers to address water-related, communicable and non-communicable diseases that can result from projects' activities.

195. Cognizant of the fact that projects' direct impacts on ecosystem services can affect the health and safety of communities, ESS4 mandates Borrowers to identify and mitigate these impacts. In

projects that involve the provision of services to communities, ESS4 requires Borrowers to apply the concept of universal access, where technically and financially feasible. In particular, the ESS4 requires Borrowers to:

- Anticipate or avoid adverse impacts on the health and safety of project-affected communities during project life cycle from routine and non-routine circumstances.
- Avoid or minimize community exposure to project-related traffic and road safety risks, diseases and hazardous materials.
- To have in place effective measures to address emergency events; and
- Ensure that safeguarding of personnel and property is carried out in a manner that avoids or minimizes risks to the project-affected communities.

196. 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. Somalia is one of the biodiversity-rich countries in the Horn of Africa with a high level of endemic species. It is however an arid and semi-arid country with fragile ecosystems subjected to harsh weather conditions, erratic and scarce amounts of rainfall, and susceptible to environmental degradation.

197. ESS8 – Cultural Heritage: ESS8 recognizes that cultural heritage provides continuity in tangible and intangible forms between the past, present and future. People identify with cultural heritage as a reflection and expression of their constantly evolving values, beliefs, knowledge and traditions. Cultural heritage, in its many manifestations, is important as a source of valuable scientific and historical information, as an economic and social asset for development, and as an integral part of people's cultural identity and practice. ESS8 sets out measures designed to protect cultural heritage throughout the project life cycle. Chance find procedures for the Project are introduced in this ESMF (Annex 8).

198. ESS10 – Stakeholder Engagement and Information Disclosure: ESS10 emphasizes stakeholders' engagement throughout the project life cycle and requires a Stakeholder Engagement Plan (SEP) to be formulated in early stages. It encourages identification of stakeholders, who are either "affected", "interested", or "vulnerable". Under ESS10, engagement must be proportionate to nature, scale of risks and impacts of the project, and appropriate to stakeholders' interests. ESS10 specifies process and criteria for information disclosure and meaningful consultation. It also requires the establishment of an accessible and inclusive Grievance Mechanism (GM), proportionate to risks and impacts. In particular, the ESS10 requires Borrowers to:

- Establish a systematic approach to stakeholder engagement that helps Borrowers identify stakeholders and build and maintain a constructive relationship with them, in particular project-affected parties.
- Assess stakeholder interest and support for the project and enable stakeholders' views to be taken into account in project design and environmental and social performance.
- Promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life cycle on issues that could potentially affect them.
- Ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner; and

- Provide the affected communities with accessible and inclusive means to raise issues and grievances and allow Borrowers to respond to and manage such grievances.

OP 7.50 Projects on International Waterways

199. OP 7.5 applies when an investment project involves the use or potential pollution of international waterways, as described in para 1 of the Policy. In the context of SHIIP, waterways include "any bay, gulf, strait, or channel bounded by two or more states or, if within one state, recognized as a necessary channel of communication between the open sea and other states--and any river flowing into such waters." OP 7.50 does apply to port infrastructure related feasibility and design studies for ports in the Gulf of Aden. These studies will be limited to assess port and navigation channel improvement and rehabilitation activities.

200. Projects on international waterways may affect relations between the Bank and its borrowers and between states (whether members of the Bank or not). The Bank recognizes that the cooperation and goodwill of riparians is essential for the efficient use and protection of the waterway. Therefore, it attaches great importance to riparians' making appropriate agreements or arrangements for these purposes for the entire waterway or any part thereof. The Bank stands ready to assist the repairs in achieving this end. In cases where differences remain unresolved between the state proposing the project (beneficiary state) and the other riparians, prior to financing the project the Bank normally urges the beneficiary state to offer to negotiate in good faith with the other riparians to reach appropriate agreements or arrangements.

Annex 5- Stakeholder Consultation Meetings

201. Under the preparation process of the Project's Stakeholder Engagement Plan (SEP), the Somali government has managed to conduct three essentials stakeholders consultative meetings. The first meeting was held on April 25, 2021, by the Ministry of Public Works, Reconstruction, and Housing and was aimed at undertaking primary identification for key project stakeholders through consultation meetings. During the meeting the Ten (10) institutions of the relevant government institutions at the federal level were invited: seven institutions attended the meeting.

202. All the meetings were held virtually due to COVID-19. During the meeting the participants discussed important issues related to the relationship between the stakeholders and the Project. Moreover, there was a follow-up consultation meeting for the previous inter-ministerial meeting. That was so, because the agenda of the previous consultation meeting were not all covered and there were some pending points, including the proposed stakeholders' engagement process, information disclosure, and grievance redress mechanisms. However, this meeting did not happen due to the impact of the political conflicts and fighting that broke out in Mogadishu on April 25, 2021. The second and third stakeholder engagement consultations were conducted on July 18 and July 29, 2021, respectively. The summary of all consultations held for this project are hereunder described in Table 10.

Table 10: Stakeholders Consultation Feedback

Location	Date	Participants	Key points raised	Xxx
Mogadishu	April 25, 2021	Line ministries – MPWRH, the MTCA, Ministry of Ports and Marine Transport (MPMT), Ministry of Energy and Water Resources (MoEWR), Ministry of Communication and Technology (MCT) Ministry of Fishery, Ministry of Environmental Ministry of Finance (MoF), Ministry of Planning Investment and Economic Cooperation (MoPIED), Ministry of Commerce (MoC)	• Include the ministry of petroleum to beneficiaries. • Strengthen the communication, coordination, collaboration of the project stakeholders at the federal level. • The Ministry of Environmental at the Office of the Prime Minister indicated the existence of draft Environmental and Social Impact Assessment regulation (2020)	•
Virtual	July 18, 2021	The Federal Ministry of Public Works, Reconstruction and Housing (MPWRH), Ministry of Public Works (Galmudug State), Ministry of Public Works (South-West State), Adeegsan Consultancy, private citizens from Benadir, Directorate of Env. and Climate Change, Ministry of Finance (FGS), Ministry of Public Works (Puntland), Ministry of Planning (FGS), Ministry of Public Works (Hirshabelle), World Bank	• The MPWRH representative highlighted the project's development objective, design and components. • The World Bank team made a presentation on the Environmental and Social Framework and its interface with the project, including a highlight of the requirements for mitigating environmental and social risks at appraisal and residual risks during implementation.	•

Location	Date	Participants	Key points raised	Xxx
			• The medium of communication for the project needs to be the Somali language. • However, the project team has been cautioned to note that there are two main Somali dialects, the standard Somalia and the Maay dialect, which should both be adopted for wider-scale reach of project communications. • In addition, the project should consider adopting different media platforms including, inter alia, local media (TV networks, radio stations, social media, and the internet in general) to reach also those who are less informed through institutions and do not read. • The project needs to consider the unique requirements of the different Federal Member States, and ensure social exclusion is mitigated effectively. • Land issues in Somalia are emotive – and this is in the light of absence of a formal codified land law system in the country: the project team is best advised to study the land tenure systems in the country carefully. • Need to tread carefully on project-level recruitment so that only the best is recruited, with fairness. • There are minorities groups in Somalia – which should be contacted by the project team so that they are not left out. • It is important not to forget the development of roads: nearly 100% of Somali goods after arrival at the ports are transported inland via roads, whose conditions are increasingly getting pathetic. • The private sector runs the transport sector – more efforts should be made to include them in project preparation.	

Location	Date	Participants	Key points raised	Xxx
			• A key stakeholder is the Somali Ports Authority – which should be contacted. • International organizations working in the Somali sphere should be contacted in order to establish their thoughts on the project. • A national environment policy has been approved by Cabinet and is operational, while the Environmental Management Act is in the final stages by DoECC – the project team needs to closely consult the Directorate going forward.	
Virtual	July 29, 2021	The Federal Ministry of Public Works, Reconstruction and Housing (MPWRH, NIS Foundation, United Nations Development Program (UNDP) Somalia, African Development Bank (AfDB), United Nations Office for Project Services (UNOPS), MoTCA, Somali Ports Authority, International Organization for Migration (IOM), World Bank	• The MPWRH representative highlighted the project's development objective, design and components. • The World Bank team made a presentation on the Environmental and Social Framework and its interface with the project, including a highlight of the requirements for mitigating environmental and social risks at appraisal and residual risks during implementation. • The project's requirements under ESF require significant investments in country systems in order to boost Somalia's own capacity to manage environmental and social risks, even beyond the lifespan of SHIIP. • The Department of Housing in the Ministry of Public Works, Reconstruction and Housing needs to prepare its own capacity plan on the social aspects of project implementation, including social risks – to enable it to contribute meaningfully. • The project team needs to establish a platform for project stakeholders on E&S risks management, to which each institution or stakeholder	•

Location	Date	Participants	Key points raised	Xxx
			associated with the project will appoint a focal point. • Security issues merit a lot of attention, especially since the project is targeting both urban and rural areas in the economic corridors. • The project should have a better understanding of the social perspectives in Somalia, including labor issues, people trafficking, gender violence – and take measures so as not to contribute in a negative way. • Other considerations for the project include gender mainstreaming, consultation and involvement of all PAPs.	

203. The project team at the Ministry of Public Works will commence to fast-track the creation of a formal platform (A dedicated hotline and helpdesk email has been established for enquiries and grievance submissions) for communication with communities and other stakeholders as identified. Consultations using public platforms will be held at regular intervals and feedback sought from, and given to, the communities and stakeholders involved. There are outstanding issues that need community engagement and consensus on the way forward. Therefore, the project shall continue to engage with the relevant stakeholders and communities and further understand community views around the following aspects.

- Land tenure systems and compensation across the various regions of interest.
- The overall role of local governments in land acquisition, resettlement, and compensation
- The role and functions of the district land authorities on the existing land tenure system, registry and land dispute resolutions.
- Land valuation -– the respective roles and responsibilities of municipalities and the national Ministry of Public Works in Mogadishu.
- Alternative methods for land acquisition for public use - voluntary land donations and how those work? What are the risks?
- Risk of displacement of IDPs.,
- Labor and working conditions.
- Mechanisms and responsibility for solving labor related issues.
- Prevalence of child and labor risks.
- Risk of labor influx and how that is handled.
- Risk of bias and discrimination against women and minorities in the opportunities and equal pay for equal work done.
- Existing mechanisms for grievance and dispute resolutions.
- Risks of SEA and possible mitigation measures.

- Grievance Redress Mechanism, its acceptability by the public, and how it can be used for handling GBV/SEAH issues.
- Potential conflicts associated with downstream project activities.
- Potential security risks and impacts to project workers and communities – and existing security set-up in the different parts of the country where the project is likely to be implemented.

The project will continue to undertake more consultations, especially around the designs of the successor project designs as well as in the framing of terms of reference for the instruments to be developed under SHIIP.

Annex 6 – Template for E&S Screening Checklist

This form is to be used by the Project Coordination Unit (PCU) to screen for the potential environmental and social risks and impacts of a proposed subproject. It will help the PCU in identifying the relevant Environmental and Social Standards (ESS), establishing an appropriate E&S risk rating for these subprojects and specifying the type of environmental and social assessment required, including specific instruments/plans. Use of this form will allow the PCU to form an initial view of the potential risks and impacts of a subproject. *It is not a substitute for project-specific E&S assessments or specific mitigation plans.*

Subprojects involving land acquisition and/or restrictions on land use are not automatically excluded. However, such subprojects will be considered ineligible if they cannot be supported by a viable Resettlement Action Plan (RAP) or equivalent instrument consistent with ESS5. This ensures that the project avoids implementing subprojects where displacement or access-related risks cannot be addressed through mitigation, compensation, or inclusive engagement.

Given that SHIIP is classified as a High-Risk project, this screening process plays a vital role in identifying subprojects that may present significant environmental and social risks. In such cases, either robust mitigation must be planned, or the subproject deferred if mitigation is not feasible. The screening checklist, therefore, integrates exclusion criteria that reflect the project's risk tolerance, institutional implementation capacity, and contextual realities in Somalia.

A note on *Considerations and Tools for E&S Screening and Risk Rating* is included in this Annex to assist the process.

Subproject Name	
Subproject Location	
Subproject Proponent	
Estimated Investment	
Start/Completion Date	

Questions	Answer		ESS relevance	Due diligence / Actions
	Yes	No		
Does the subproject involve civil works including new construction, expansion, upgrading or rehabilitation of healthcare facilities, vaccine cold storage units and/or waste management facilities?			ESS1	ESIA/ESMP, SEP
Does the subproject involve land acquisition and/or restrictions on land use?			ESS5	Eligible if supported by a viable Resettlement Action Plan (RAP) or equivalent instrument consistent with ESS5. Otherwise, not eligible.
Does the subproject involve acquisition of assets for quarantine, isolation or medical treatment purposes?			ESS5	
Is the subproject associated with any external waste management facilities such as a sanitary landfill, incinerator, or wastewater treatment plant for healthcare waste disposal?			ESS3	ESIA/ESMP, SEP
Is there a sound regulatory framework and institutional capacity in place for healthcare facility infection control and healthcare waste management?			ESS1	ESIA/ESMP, SEP
Does the subproject have an adequate system in place (capacity, processes and management) to address waste?			ESS3	
Does the subproject involve recruitment of workers including direct, contracted, primary supply, and/or community workers?			ESS2	LMP, SEP
Does the subproject have appropriate OHS procedures in place, and an adequate supply of PPE (where necessary)?			ESS2	
Does the subproject have a GM in place, to which all workers have access, designed to respond quickly and effectively?			ESS2	

Questions	Answer		ESS relevance	Due diligence / Actions
	Yes	No		
Does the subproject involve transboundary transportation (including Potentially infected specimens may be transported from healthcare facilities to testing laboratories, and transboundary) of specimen, samples, infectious and hazardous materials?			ESS3	ESIA/ESMP, SEP
Does the subproject involve use of security or military personnel during construction and/or operation of healthcare facilities and related activities?			ESS4	ESIA/ESMP, SEP
Is the subproject located within or in the vicinity of any ecologically sensitive areas?			ESS6	ESIA/ESMP, SEP
Are there any indigenous groups (meeting specified ESS7 criteria) present in the subproject area and are they likely to be affected by the proposed subproject negatively or positively?			ESS7	Indigenous Peoples Plan/other plan reflecting agreed terminology
Is the subproject located within or in the vicinity of any known cultural heritage sites?			ESS8	ESIA/ESMP, SEP
Does the project area present considerable Gender-Based Violence (GBV) and Sexual Exploitation and Abuse (SEA) risk?			ESS1	ESIA/ESMP, SEP
Does the subproject carry the risk that disadvantaged and vulnerable groups may have unequitable access to project benefits?			ESS1	ESIA/ESMP, SEP
Is there any territorial dispute between two or more countries in the subproject and its ancillary aspects and related activities?			*OP7.60 Projects in Disputed Areas*	Governments concerned agree
Will the subproject and related activities involve the use or potential pollution of, or be located in international waterways[30]?			*OP7.50 Projects on International Waterways*	Notification (or exceptions)

[30] International waterways include any river, canal, lake or similar body of water that forms a boundary between, or any river or surface water that flows through two or more states.

Conclusions (based on screening and exclusion lists):

1. Proposed Environmental and Social Risk Ratings (High, Substantial, Moderate or Low). Provide Justifications.

2. Proposed E&S Management Plans/ Instruments to be prepared.

Note: The initial screening for the selection of the subprojects shall be conducted based on the following exclusion criteria:

a) Activities that may cause long term, permanent and/or irreversible impact on major natural habitat.

b) Activities that may have significant adverse social impacts and/ or may give rise to significant social conflict.

c) Activities that may involve forced displacement or massive land acquisition.

d) Activities that may involve impacts on cultural heritage without full consent of the community.

e) Activities that may involve non agreement on land acquisition and resettlement procedures as per RAP.

f) Non availability of budget to timely compensate as per RAP.

g) Activities in high insecurity area/inaccessible area due to conflict and security risks as per project Security Management Plan.

Annex 7– Indicative Template for ESMP

Introduction

- The government shall prepare, disclose, consult, adopt and implement activity-based/ area-based/ site-specific Environmental and Social Management Plans including plans to implement all E&S instruments required for the respective project activities and interventions based on the screening and assessment processes, in accordance with the ESSs, the ESMF, the EHSGs, and other relevant Good International Industry Practice (GIIP), including relevant WHO guidelines to, inter alia, ensure access to and allocation of Project benefits in a fair, equitable and inclusive manner, taking into account the needs of individuals or groups who, because of their particular circumstances, may be disadvantaged or vulnerable. In addition, ESMPs will be provided by implementing partner and the FGS together with the integrated rollout plans. The E&S checklist can be used to guide the implementing partner's ESMP and can be used for other contractors or subcontractors. This ESMP template identifying key risks and setting out suggested E&S mitigation measures. However, the Borrower can use the matrices to assist in identifying risks and possible mitigations.
- The ESMP should also include other key elements relevant to delivery of the project, such as institutional arrangements, plans for capacity building and training, and background information. The Borrower may incorporate relevant sections of the ESMF into the ESMP, with necessary updates. The matrices illustrate the importance of considering lifecycle management of E&S risks, including during the different phases of the project identified in the ESMF: planning and design, construction, operations and decommissioning.
- The WBG EHS Guidelines, WHO technical guidance documents and other GIIPs set out in detail many mitigation measures and good practices and can be used by the Borrower to develop the ESMP. Proper stakeholder engagement should be conducted in determining the mitigation measures, including close involvement of medical and healthcare waste management professionals.
- The Borrower will follow the ESMP outline set out in the "E. Indicative outline of ESMP/ ESS1/ ESF", which includes the following guidance:

An ESMP consists of the set of mitigation, monitoring, and institutional measures to be taken during implementation and operation of a project to eliminate adverse environmental and social risks and impacts, offset them, or reduce them to acceptable levels. The ESMP also includes the measures and actions needed to implement these measures. The Borrower will:

(a) identify the set of responses to potentially adverse impacts.

(b) determine requirements for ensuring that those responses are made effectively and in a timely manner; and

(c) describe the means for meeting those requirements.

Depending on the project, an ESMP may be prepared as a stand-alone document, or the content may be incorporated directly into the ESCP. The content of the ESMP will include the following:

A. Mitigation

The ESMP identifies measures and actions in accordance with the mitigation hierarchy that reduce potentially adverse environmental and social impacts to acceptable levels. The plan will include compensatory measures, if applicable. Specifically, the ESMP:

- identifies and summarizes all anticipated adverse environmental and social impacts (including those involving indigenous people or involuntary resettlement);
- Describes with technical details—each mitigation measure, including the type of impact to which it relates and the conditions under which it is required (e.g., continuously or in the event of contingencies), together with designs, equipment descriptions, and operating procedures, as appropriate.

- estimates any potential environmental and social impacts of these measures; and
- takes into account, and is consistent with, other mitigation plans required for the project (e.g., for involuntary resettlement, indigenous peoples, or cultural heritage).

B. Monitoring

ESMP identifies monitoring objectives and specifies the type of monitoring, with linkages to the impacts assessed in the environmental and social assessment and the mitigation measures described in the ESMP. Specifically, the monitoring section of the ESMP provides (a) a specific description, and technical details, of monitoring measures, including the parameters to be measured, methods to be used, sampling locations, frequency of measurements, detection limits (where appropriate), and definition of thresholds that will signal the need for corrective actions; and (b) monitoring and reporting procedures to (i) ensure early detection of conditions that necessitate particular mitigation measures, and (ii) furnish information on the progress and results of mitigation.

C. Capacity Development and Training

- To support timely and effective implementation of environmental and social project components and mitigation measures, the ESMP draws on the environmental and social assessment of the existence, role, and capability of responsible parties on site or at the agency and ministry level.
- Specifically, the ESMP provides a specific description of institutional arrangements, identifying which party is responsible for carrying out the mitigation and monitoring measures (e.g., for operation, supervision, enforcement, monitoring of implementation, remedial action, financing, reporting, and staff training).
- To strengthen environmental and social management capability in the agencies responsible for implementation, the ESMP recommends the establishment or expansion of the parties responsible, the training of staff and any additional measures that may be necessary to support implementation of mitigation measures and any other recommendations of the environmental and social assessment.

D. Implementation Schedule and Cost Estimates

For all three aspects (mitigation, monitoring, and capacity development), the ESMP provides (a) an implementation schedule for measures that must be carried out as part of the project, showing phasing and coordination with overall project implementation plans; and (b) the capital and recurrent cost estimates and sources of funds for implementing the ESMP. These figures are also integrated into the total project cost tables.

E. Integration of ESMP with Project

The Borrower's decision to proceed with a project, and the Bank's decision to support it, are predicated in part on the expectation that the ESMP (either stand alone or as incorporated into the ESCP) will be executed effectively. Consequently, each of the measures and actions to be implemented will be clearly specified, including the individual mitigation and monitoring measures and actions and the institutional responsibilities relating to each, and the costs of so doing will be integrated into the project's overall planning, design, budget, and implementation.

- The following matrix can be used by the Borrower in the activity-based/ area-based/ site-specific ESMP. More rows can be added as required, based on the expected project life phases, for a decommissioning phase, for instance:

E&S aspects/ risks and impacts	Mitigation measures	Monitoring/ Supervision measures	Monitoring/ Supervision frequency	Monitoring/ Supervision indicators	Responsibilities		Cost estimate (USD)
					Mitigation	Monitoring	
Construction phase (incl. preconstruction)							
Operation phase							

Annex 8 - Protection of Cultural Property

This procedure was developed in accordance with the World Bank's ESS 8 (to protect cultural heritage from the impacts of project activities and support its preservation, to address cultural heritage as an integral aspect of sustainable development, to promote meaningful consultation with stakeholders regarding cultural heritage. To promote the equitable sharing of benefits from the cultural heritage).

This procedure is to be included as a standard provision in the implementation of civil works contracts to ensure the protection of cultural heritage (Archaeological and Historical Sites). All implementers / contractors will be required to observe this procedure as documented hereafter, as well as update according to site conditions and requirements.

Excavation in sites of known archaeological interest should be avoided. Where this is unavoidable, prior discussions must be held with the PCU and the World Bank in order to undertake pre-construction excavation or assign an archaeologist to log discoveries as construction proceeds. Where historical remains, antiquity or any other object of cultural or archaeological importance are unexpectedly discovered during construction in an area not previously known for its archaeological interest, the following procedures should be applied:

- Stop construction activities.
- Delineate the discovered site area.
- Secure the site to prevent any damage or loss of removable objects. In case of removable antiquities or sensitive remains, a full-time guard should be present until the authority responsible takes over;
- Notify the responsible foreman/archaeologist, who in turn should notify the PCU and the World Bank and local authorities (within less than 24 hours);
- The significance and importance of the findings will be assessed according to various criteria relevant to cultural heritage including aesthetic, historic, scientific or research, social and economic values.
- Decision on how to handle the findings will be reached based on the above assessment and could include changes in the project layout (in case of finding an irrevocable remain of cultural or archaeological importance), conservation, preservation, restoration or salvage;
- Implementation of the decision concerning the management of the finding.
- Construction work can resume only when permission is given from the respective authorities, PCU and World Bank, after the decision concerning the safeguard of the heritage is fully executed; and
- In case of delay incurred in direct relation to archaeological findings not stipulated in the contract (and affecting the overall schedule of works), the contractor may apply for an extension of time. However, the contractor will not be entitled for any kind of compensation or claim other than what is directly related to the execution of the archaeological findings, works and protections.

Annex 9 – Detailed List of Managing OHS-related Risks and Impacts

#	Expected OHS risks and impacts	Proposed mitigation measures
During rehabilitation activities		
1	Over-exertion: including ergonomic injuries and illnesses, such as repetitive motion, over-exertion, and manual handling, are among the most common causes of injuries in construction and decommissioning sites.	- Training workers on lifting and material handling techniques, including defining weight limits beyond manual capacities. - Planning a worksite layout to minimize the need for manual transfer of heavy loads. - Selecting tools and designing workstations that reduce force requirements and holding times; and - Adopting and enforcing job rotations and rest or stretch breaks
2	Spills and falls: including on same elevations, and associated with poor housekeeping, such as: excessive waste debris, loos materials, liquid spills, electric cords and ropes on the ground	- Implementing good housekeeping practices, such as sorting, and placing materials away from foot paths. - Cleaning up excessive waste debris and liquid spills regularly; - Locating electrical cords and ropes in common areas and marked corridors; and - Using slip retardant footwear.
3	Work in heights: including falling from elevations associated with the use of ladders, scaffolds, and partially built and demolished structures	- Training and use of fall prevention devices, including rails and barriers that support a weight of 200 pounds; - Training and use of fall arrest systems, such as full body harnesses and energy absorbing lanyards able to support 5000 pounds; and - Use of control zones and safety monitoring systems to warn workers of their proximity to fall hazard zones, as well as securing, marking, and labeling covers for openings in floors, roofs, or walking surfaces.
4	Struck by objects: including potential fall of materials or tools, as well as ejection of solid particles from abrasive or other types of power tools, resulting in injury to the head, eyes and extremities	- Designating and restricting the use of drop or discharge zones/ chutes for safe movement of wastes. - Conducting sawing, cutting, grinding, sanding, chipping or chiseling with proper guards and anchoring as applicable. - Maintaining clear traffic ways to avoid driving of heavy equipment over loose scrap. - Using fall protection measures in scaffolds and out edges, including hand rails and toe boards; and - Wearing appropriate PPE, such as safety glasses with side shields, face shields, hard hats, and safety shoes.
5	Moving machinery: including physical contact, spills, dust, emissions, and	- Planning and segregating vehicle traffic location, machine operation, and walking areas, and controlling

#	Expected OHS risks and impacts	Proposed mitigation measures
	noise hazards of vehicle traffic and use of lifting equipment on a construction site.	vehicle movement through using one-way traffic routes; - Establishing speed limits, and on-site trained flag-people wearing high-visible vests, and using eye verification contact with equipment operators; - Ensuring moving equipment is outfitted with audible back-up alarms; and - Inspecting and maintaining lifting devices for their loads.
6	Exposure to site hazards: including dust, chemicals, hazardous or flammable materials and wastes, which will lead to various adverse health impacts and respiratory illnesses	- Using suppressing techniques, such as applying water or non-toxic chemicals to minimize dust from vehicle movement; - Using PPE, such as dust mask, where dust levels are excessive, as well as waste-specific PPE following an appropriate assessment; and - Using specially trained personnel to remove wastes from tanks or contaminated lands prior to excavation, including removing asbestos, insulation elements, and electrical components.
7	Confined spaces and excavations: including utility vaults, tanks, sewers, pipes, access shafts, ditches and trenches	- Reducing slope instability by using excavation dewatering, side-wall support, and eliminating risk of collapse, entrapment, and drowning; - Providing safe means of access and egress from excavations; and - Avoiding prolonged operation of combustion equipment inside excavation areas and entering of workers, unless actively ventilated.
During operation		
8	Risk of injuries: including of manual handling, such as sprains and strains from lifting and carrying patients, falls, trips, and slips caused by moving objects as well as mental stress	- Using of mechanical assists to eliminate or reduce exertions required to carrying patients, holding tools and work objects, and requiring multi-person lifts if weights exceed thresholds; - Providing user adjustable work stations; - Incorporating rest and stretch breaks into work processes, and conducting job rotation; and - Implementing good housekeeping practices, such as sorting, and placing materials away from foot paths.
9	Exposure to infections/ diseases: Health care providers and personnel may be exposed to general infections, blood-borne pathogens, and other potential infectious materials	- Formulating an exposure control plan for blood-borne pathogens; - Providing staff and visitors with information on infection control policies and procedures; - Establishing standard precautions, which may include: immunization, using masks, gloves and gowns; hand washing facilities; following procedures and using

#	Expected OHS risks and impacts	Proposed mitigation measures
	during care and treatment, as well as during collection, handling, treatment, and disposal of health care waste	facilities for handling dirty linen and contaminated clothing and handling food; and applying appropriate cleaning and waste disposal practices for health care workplace; - Using safe needles and needleless devices to reduce risk of sharps exposure. Do not bend, recap, or remove contaminated needles and sharps unless required in a procedure. Do not shear or break contaminated sharps. Use needle containers and discard immediately. Use disposable razors and dispose of in appropriate sharps containers; - Immunizing staff members as necessary (COVID-19, hepatitis B, tetanus, etc.); - Providing adequate supplies of PPE for personnel involved in waste management including: overalls / industrial aprons, leg protectors, boots, heavy duty gloves, helmets, visors /face masks and eye protection (especially for cleaning of hazardous spills), and respirators (for spills or waste involving toxic dust or incinerator residue) as necessary; and - Providing washing facilities for personal hygiene, particularly at waste storage locations.
10	Exposure to hazardous materials and waste: including glutaraldehyde, ethylene oxide, formaldehyde, mercury, chemotherapy and antineoplastic chemicals, solvents, and photographic chemicals, among others	- Segregating corrosive, oxidizing and reactive chemicals from flammable materials and from other chemicals of incompatible class (acids vs. bases, oxidizers vs. reducers, water sensitive vs. water based, etc.), and storing in ventilated areas and in containers with appropriate secondary containment to minimize intermixing during spills; - Providing workers who are required to handle corrosive, oxidizing, or reactive chemicals with specialized training and provided with, and wear, appropriate PPE (gloves, apron, splash suits, face shield or goggles, etc.); - Ensuring qualified first-aid, where corrosive, oxidizing, or reactive chemicals are used, handled, or stored, qualified first-aid at all times; and - Ensuring easy accessibility to appropriately equipped first-aid stations throughout the place of work and providing eye-wash stations and/or emergency showers close to all workstations, where the recommended first-aid response is immediate flushing with water.

#	Expected OHS risks and impacts	Proposed mitigation measures
11	Exposure to radiation: including equipment emitting X-rays and gamma rays (e.g. CT scanners), radiotherapy machines, and equipment for nuclear medicine activities, which can lead to discomfort, injury or serious illness to workers	- Establishing and operating places of work involving occupational and/or natural exposure to ionizing radiation in accordance with recognized international safety standards and guidelines. - Controlling exposure to non-ionizing radiation (including static magnetic fields; sub-radio frequency magnetic fields; static electric fields; radio frequency and microwave radiation; light and near-infrared radiation; and ultraviolet radiation) to internationally recommended limits; and - Shielding and limiting the radiation source in the case of both ionizing and non-ionizing radiation. PPE is supplemental only or for emergency use. PPE for near-infrared, visible and ultraviolet range radiation can include appropriate sun block creams, with or without appropriate screening clothing.
12	Risk of fire: due to the storage, handling, and presence of chemicals, pressurized gases, boards, plastics, and other flammable substrates	- Installing smoke alarms and sprinkler systems; - Maintaining all fire safety systems in proper working order, including self-closing doors in escape routes and ventilation ducts with fire safety flaps. - Training of staff for the operation of fire extinguishers and evacuation procedures; - Development of facility fire prevention or emergency response and evacuation plans with adequate guest information (this information should be displayed in obvious locations and clearly written in relevant languages).

Annex 10 – Indicative Environmental Stewardship Framework for Contractors

This annex provides an indicative environmental stewardship framework to guide contractors in the preparation and implementation of Contractor Environmental and Social Management Plans (C-ESMPs). It is aligned with the ESMF's broader mitigation strategy (see Chapter 6, Table 4) and with relevant Environmental and Social Standards (ESS) under the World Bank's ESF. Contractors shall ensure that the C-ESMP reflects the commitments in the subproject-specific ESMPs and contract clauses, and integrates all required measures in compliance with:

- ESS1: Assessment and Management of Environmental and Social Risks and Impacts
- ESS3: Resource Efficiency and Pollution Prevention and Management
- ESS4: Community Health and Safety
- ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources

ENVIRONMENTAL STEWARDSHIP FOR CONTRACTORS OF THE SOMALIA INTEFRATED INFRASTRUCTURE PROJECT

#	ENVIRONMENTAL ISSUE	POTENTIAL IMPACT	INDICATIVE MITIGATIONS
Pre-construction/Construction Phase			
1	Land Use	Passage of contractor's vehicles through grazing reserves or cultivated and forested land resulting in a permanent loss of the resources. The environmental effects can amplify if proper operation and maintenance schedules are not followed.	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.
2	Material Use	Excess extraction of local resources, such as wood, sand, soil, boulders, etc. Degradation of forests, erosion and landslide at steep locales due to boulder, stone extraction. Change in river and stream ecosystem due to unchecked sand extraction	Extract materials only on need basis Avoid sensitive areas, such as steep slopes Follow engineer's directions at all times
3	Slope Stability	Extraction of forest products and cutting of trees in the steep slopes increases soil erosion and landslide due to loss of soil binding materials.	Extract carefully and secure the topsoil within 25 cm from the surface.

#	ENVIRONMENTAL ISSUE	POTENTIAL IMPACT	INDICATIVE MITIGATIONS
		Wrong alignment can trigger slope failure. Haphazard disposal of construction waste can disturb slopes. Improper drainage facilities can result in erosion and landslides	Limit down grading of the infrastructure such as temporary road to 50 If down grading exceeds 70, construction of side drainage is necessary. Keep optimum balance in extraction and filling of soil works, geo-hazardous assessment and mapping. Use designated disposal site and avoid side-casting of spoil. Provide proper drainage. Use bio-engineering on exposed slopes
4	Wildlife	Wildlife habitats at forests, shrub-lands along water infrastructure corridor are affected by the infrastructure construction activities. Wildlife and human conflicts increase as wildlife might destroy the crops or attack the construction workers.	Avoid as much as possible areas with high biodiversity. Efficient movement of machinery and other traffic. Control poaching activities and regulate movement of labor force and their dependents into the forest area. 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.
5	Drainage	Higher flow rate of surface water and water logging induce landslides, erosion.	It is strongly recommended that the cross-drainage outlets must be channeled to the confirmed natural drains. If horizontal slope exceeds 5%, construction of flow control device necessary every 20 m

#	ENVIRONMENTAL ISSUE	POTENTIAL IMPACT	INDICATIVE MITIGATIONS
6	Protection of Vegetation	Protected areas and highly forested areas Degradation of forest areas Degradation of agricultural land	Use minimum and efficient use of wood products for construction. Initiate plantation at damaged and damage prone areas. Increase liability of local forest user groups. Avoid protected areas or densely forested areas.
7	Disposal of Construction Wastes	Dumping of wastes along the infrastructure such as roads or elsewhere	Selected spoil dumping sites should be used. After disposal, the area should be levelled and compacted. It is recommended to conserve the soil by planting indigenous plants including grasses. 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	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 likely from construction machinery operation and vehicular movement.	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.

#	ENVIRONMENTAL ISSUE	POTENTIAL IMPACT	INDICATIVE MITIGATIONS
		Sanitary problems likely at the construction and workforce quarters.	
Operation Phase			
1	Encroachment	Unmanaged settlement, constructions near the existing and new road sections.	Community zoning recommended, with enforcement
3	Pollution/Vehicle Emission	Dust generation from vehicular movement increases air pollution. Noise pollution likely from vehicular movement.	Enforce speed limit of vehicles. Maintain traffic size movement. Discourage use of horns.
4	Aesthetics	Infrastructure such as port dredging and energy transmission line 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

Note: All mitigation measures in this table should be read in conjunction with Chapter 6 (Table 4) of this ESMF and the relevant World Bank Environmental and Social Framework (ESF) standards, including ESS1, ESS3, ESS4, and ESS6.

Annex 11: Summary of stakeholders Deliberations held on April 2021, for SHIIP project

Consultation was conducted virtually due to COVID 19 restrictions, the first consultation was conducted for the …… and representatives of ……. for the five participating regional federal member states. Presentations were made and participants requested feedback. The below tabled summarizes areas covered, issues raised by participants and responses and recommendations provided.

Theme	Issue raised	Response and recommendations provided by PCU

List of attendance of the virtual consultative meeting held on April …….. 2021

S/N	NAME	Gender	Institution/State	Contact	Title
1					
2					

ANNEX 12: SAMPLE GRIEVANCE REGISTRATION FORM

Example of Complaints Form (to be translated into Somali)

1. Complainant's Details

Full name or Reference number (unless confidentiality has been requested):

_____

Male/Female

Mobile _____

Email _____

District_____

Relationship to the project

_____

Age (in years): _____

2. Which institution or officer/person are you complaining about?
   Ministry/department/agency/company/group/person

_____

3. Have you reported this matter to any other public institution/ public official?
   ☐ Yes ☐ No

4. If yes, which one?

_____

5. Has this matter been the subject of court proceedings?
   ☐ YES ☐ NO

6. Please give a brief summary of your complaint and attach all supporting documents [Note to indicate all the particulars of *what* happened, *where* it happened, *when* it happened and by *whom*]

_____
_____
_____
_____

7. What action would you want to be taken?

_____
_____
_____
_____

Signature _____

Date _____