



**FEDERAL GOVERNMENT OF SOMALIA**

**Ministry of Finance (MoF)**

**PROJECT: Somalia Crisis Recovery Project (SCRP)**

**PROJECT ID- P173315**

**Environmental and Social Management Plan (ESMP)**

**REHABILITATION OF ELWAK ROAD AND DOLOW ROAD IN  
BELETHAWA, JUBALAND STATE**

**4 July 2022**

**Project Implementation Unit (PIU)**

**Ministry of Finance**

**Federal Government of Somalia**

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## LIST OF ACRONYMS AND ABBREVIATIONS

|         |                                                  |
|---------|--------------------------------------------------|
| CERC    | Contingency Emergency Response Component         |
| CESMP   | Contractor-ESMP                                  |
| CoC     | Code of Conduct                                  |
| CRW     | Crisis Response Window                           |
| CRW ERA | Crisis Response Window Early Response Allocation |
| CSO     | Civil Society Organization                       |
| E&S     | Environmental & Social                           |
| EIA     | Environmental Impact Assessments                 |
| ESF     | Environmental and Social Framework               |
| EHSG    | Environmental, Health and Safety Guidelines      |
| ESMF    | Environmental and Social Management Framework    |
| ESMP    | Environmental and Social Management Plan         |
| ESS     | Environmental and Social Standard                |
| FAO     | Food and Agricultural Organization               |
| FGS     | Federal Government of Somalia                    |
| FMS     | Federal Member State                             |
| GBV     | Gender-Based Violence                            |
| GIIP    | Good International Industry Practices            |
| GRM     | Grievance Redress Mechanisms                     |
| IDP     | Internally Displaced Person                      |
| IP      | Implementing Partner                             |
| LMP     | Labor Management Procedures                      |
| OHS     | Occupational Health and Safety Standards         |
| PAPs    | Project Affected Persons                         |
| PDO     | Project Development Objective                    |
| PIU     | Project Implementation Unit                      |
| PSC     | Project Steering Committee                       |
| POM     | Project Operations Manual                        |
| PPE     | Personal Protective Equipment                    |
| PSEA    | Prevention of Sexual Exploitation and Abuse      |
| RAP     | Resettlement Action Plan                         |
| RPF     | Resettlement Policy Framework                    |
| SCRP    | Somalia Crisis Recovery Project                  |
| SEA     | Sexual Exploitation and Abuse                    |
| SEP     | Stakeholder Engagement Plan                      |
| SH      | Sexual Harassment                                |
| SMP     | Security Management Plan                         |
| SPT     | State Project Team                               |
| SWALIM  | Somalia Water and Land Information Management    |
| SWS     | South West State                                 |
| UN      | United Nations                                   |
| UNDP    | United Nations Development Programme             |
| UNICEF  | United Nations' Children Fund                    |

|       |                                |
|-------|--------------------------------|
| UNFPA | United Nations Population Fund |
| WB    | The World Bank                 |
| WMP   | Waste Management Plan          |

## Executive Summary

The proposed Project aims to rehabilitate parts of Elwak and Dolow Roads in Beledhawa District, Jubaland State. The proposed Project is located along the northwestern border of Somalia with Kenya and Ethiopia, in Beledhawa District. The district is approximately 3900 km<sup>2</sup>, and is located approximately 500 km from the capital Mogadishu, it borders the Kenyan town of Mandera. Elwak Road is one of the main roads and heads southwest to Elwak. It is a gravel road in poor condition. The road terrain is flat within town and heads uphill on the outskirts of town. It generally acts as a drainage channel during the rains. Sections have been washed out by flood waters running along and across the road. Dolow Road is the main road to Dolow, it is a gravel road with low sections that flood within town due to lack of drainage outfalls. There are road bumps installed by the community which have contributed to pooling of water. The proposed intervention is a paved road to bitumen standards while some sections will be rehabilitated with gravel surfacing.

This Environmental and Social Management Plan (ESMP) specifies the means through which the adverse environmental and social risks and impacts of the Project associated with pre-construction, construction and operational activities are either avoided or mitigated. It aims to identify, characterize and manage the potential risks and impacts in the road rehabilitation of identified project roads in Beledhawa. The ESMP lists the project-specific risks and impacts and mitigation measures, layout institutional arrangements for implementing and monitoring the risk mitigation measures and proposes monitoring indicators for measurement and monitoring of E&S performance.

There are significant positive impacts that are expected from the project. The primary beneficiaries are populations in rural areas, including farmers, agro-pastoralists, pastoralists, and rural IDPs that benefit due to improved access to the urban centers for social services, access to livelihood opportunities and economic gains. The improved roads would lead to savings in travel time and vehicle maintenance costs that could benefit the rural population..

The project team has undertaken an E&S screening of the sub-project, as per process described in the SCRPF ESMP<sup>1</sup>. The screening resulted in placing the sub-project into 'Category C: Moderate Risk', as per the levels defined in the ESMP. It was decided that an ESMP would best guide the risk management for the sub-project.

The activities associated with the rehabilitation of the roads will likely generate adverse site-specific risks and impacts. Most of these are related to typical risks and impacts in civil works, for example, risks related to disposal and management of large amounts of excavated material generated from construction activities during the construction phase, occupational health and safety of workers both during the construction and operational phases, increased level of dust, noise and vibration from moving of construction vehicles and machinery, community health and safety risk, risks associated with labor rights and management, e.g. child labor or forced labor, labor influx and associated risks such as GBV/SEAH, and others.

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<sup>1</sup> Ministry of Finance, Somalia Crisis Recovery Project, Environmental and Social Management Framework (ESMF), disclosed at: [https://www.cabri-sbo.org/uploads/files/Covid19BudgetDocuments/Somalia\\_2020\\_Planning\\_External\\_NationalPlan\\_MinPlanning\\_CEN-SADIGAD\\_English.pdf](https://www.cabri-sbo.org/uploads/files/Covid19BudgetDocuments/Somalia_2020_Planning_External_NationalPlan_MinPlanning_CEN-SADIGAD_English.pdf)

This ESMP lays out the specific adverse risks and impacts anticipated for the project, lays out the respective mitigation measures, and lists monitoring responsibilities. It shows exactly what must be done, by whom, when, and to what standard; and also shows who will monitor its implementation and when, and what the budget implications for both, mitigation measures and monitoring activities are. It further includes a description of the Project Grievance Redress Mechanism (GRM), which needs to be applied throughout the implementation of the sub-project, and reiterates stakeholder consultations that have been conducted in the lead up to the project design.

# 1. Introduction

## 1.1 Project Background

The Federal Government of Somalia (FGS) appealed for emergency assistance and investment in longer-term solutions to avert a future crisis in October 2019, with the government-led response directed by a high-level inter-ministerial Flood Response Committee. This was followed by an appeal by the FGS to the World Bank to support a government-led Post Disaster Needs Assessment and Floods Recovery and Resilience Framework for the flood-affected areas in early December 2019, followed by a further request in January 2020 to the World Bank for funding from the International Development Association (IDA) Crisis Response Window (CRW) to support flood recovery and resilience-building.

The Somalia Crisis Response Project (SCRCP) contains the following components:

**Component 1 Immediate basic services and livelihood support for early recovery** to the flood-affected states of Hirshabelle, South West, and Jubaland and locust-affected areas nationally.

**Component 2: Medium-term flood recovery** to rehabilitate critical public and community infrastructure in line with build-back-better and climate-resilient standards.

**Component 3: Longer-term disaster risk management and preparedness.** This component will strengthen the institutional capacity and preparedness of governmental ministries agencies and departments to respond to flood and drought related emergencies.

**Component 4: Project Management.** This component will strengthen the institutional capacity Project Implementation Unit (PIU) and State Project Teams for the implementation of the Project.

**Component 5: Contingency Emergency Response Component.** This Contingency Emergency Response Component (CERC) is included in the Project in accordance with Investment Project Financing (IPF) Policy.

**Component 6: Anticipatory and Recovery Support for Addressing Food Insecurity.** The proposed scope of this new component supported with subsequent additional financing to address food insecurity has two subcomponents consistent with the original objective of the SCRCP. They are (a) Anticipatory Action and Early Response Support to Food Insecure Communities, and (b) Medium-term Sustainable Recovery and Resilience of Food Insecure Communities.

The proposed sub-project for the rehabilitation of Elwak and Dolow Roads will be implemented under component 2 - medium-term flood recovery - which supports the rehabilitation of critical infrastructure in line with build-back better and climate-resilient standards. The project road has been selected in consultation with the State and local government partners, community stakeholders and is also taking into consideration component 2 eligibility.

The project team has undertaken an E&S<sup>2</sup> screening of the sub-project, as per process described in the SCRP ESMF<sup>3</sup>. The screening resulted in placing the sub-project into 'Category C: Moderate Risk', as per the levels defined in the ESMF. It was decided that an ESMP would best guide the risk management for the sub-project.

### **1.2 Purpose of the ESMP**

The ESMP lists the key elements of an Environmental and Social Management Plan (ESMP) capturing the typical environmental and social (E&S) risks and impacts and associated mitigation measures that need to be considered at minimum in the context of rehabilitation activities of proposed project roads. The purpose of the management plan is to provide a consolidated summary of all the Environmental and Social (E&S) commitments relevant for the construction phase of the project. The measures focus on environmental aspects such as air emissions, environmental contamination and social aspects such as communication with local stakeholders and safety of workers and communities. The ESMP lists the project-specific risks and impacts and mitigation measures, lays out the institutional arrangements of the implementation and monitoring of the risk mitigation measures, and proposes monitoring indicators for measurement and monitoring of E&S performance.

The objective of this ESMP is therefore to provide management actions to mitigate negative risks and impacts in consistence with national framework (and/or regional references) and in alignment with relevant WB's ESSs & WBG General Environmental Health and Safety Guidelines EHSGs.

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<sup>2</sup> For the sake of simplicity, the acronym E&S is used throughout this document, but this acronym should be interpreted as including environment, social, occupational health and safety, human rights and labour aspects.

<sup>3</sup> Ministry of Finance, Somalia Crisis Recovery Project, Environmental and Social Management Framework (ESMF), disclosed at: [https://www.cabri-sbo.org/uploads/files/Covid19BudgetDocuments/Somalia\\_2020\\_Planning\\_External\\_NationalPlan\\_MinPlanning\\_CEN-SADIGAD\\_English.pdf](https://www.cabri-sbo.org/uploads/files/Covid19BudgetDocuments/Somalia_2020_Planning_External_NationalPlan_MinPlanning_CEN-SADIGAD_English.pdf)

## 2. Policy and Legal Framework

### 2.1 National Regulatory and Policy Framework

Somali policy and legislation with respect to the environment is nascent or outdated. A number of international agreements exist, and although binding on Somalia, there has been little progress in the implementation of those. These international environment agreements include topics such as biodiversity, desertification, endangered species, and ozone layer protection.

In recent years the Federal Republic of Somalia and its Federal Member States (FMS) have effected constitutional changes that define natural resources, common environmental goods and ecosystem services as protectable public assets, and ascertain the right to a clean and healthy environment. However, there are no specific environmental regulations in place. Protection and use of Somali water resources is the responsibility of the Ministry of Water Resources that has put a policy, act and regulatory framework in place. The Min. for Natural Resources (MNR), shall establish the Regional Watch Councils (REWC). The MNR, in consultation with the Local Government Councils/ District Governor, local CSO/CBOs and the community shall establish the District Environment and Environment Watch Council (DEWC).

As a stop gap measure, in the absence of a national regulatory framework for sustainable environment, Somalia has a Provisional Constitution (2012) that contains a number of parameters relevant for various operational activities for the planned sub-project of the SCRP: Article 12 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 stipulates that a person may not be subjected to slavery, servitude, trafficking, or forced labor for any purpose; Art 24. Prohibits sexual abuse 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 work place. Every labor law and practice shall comply with gender equality in the workplace; 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.

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 safeguard 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.

The Labour Code of 1972<sup>4</sup> (Art. 31-42) stipulates that all contracts of employment must include a) the nature and duration of the contract; b) the hours and place of work; c) the remuneration payable to the

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<sup>4</sup> The Code has recently been revised, but the revisions have not yet been passed and signed into law.

worker; and c) the procedure for suspension or termination of contract. Furthermore, all contracts must be submitted to the competent labor inspector for pre-approval.

In regards to occupational health and safety standards (OHS), the employer is obligated to provide adequate measures for health & safety protecting staff against related risks, including the provisions 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.

The Labour Code (Art. 134-140) further stipulates that 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 in regards 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 weight or work at night. The Labor Code further forbids work for children below the age of 12, but allows employment of children between the age of 12-15, yet employment has to be compatible with proper protection, health and the morals 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.

The Labor Code stipulates the right to equal pay for the same work as men, paid maternity leave. Women are entitled to 14 weeks of maternity leave at half pay.

**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 omitted with violence' are punishable with 5-15 years and 1-5 years of imprisonment. Abduction for the purpose of lust or marriage is prohibited under Art 401.

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

**The National Environmental Policy (2015)** promotes the use of appropriate environmental assessment instruments. However, the implementation of this policy has not been rolled out in Jubaland.

In regards to the institutional capacity for environmental management, a Directorate of Environment is integrated in the Office of the Prime Minister. It is mandated to draft relevant policies and legislation, including establishing of the Environmental Quality Standards, and Sectoral Environmental Assessments, Environmental Impact Assessments (EIA). Laws on environmental governance in Jubaland are at infancy stages and environmental impact assessment capacity is nascent. Environmental decision-making arrangements includes the FGS signing international conventions, and parliament approving Environmental Acts and Laws. However, necessary laws have not been formulated yet.

## **2.2 International Conventions Signed and Ratified by Somalia**

The 1992 United Nations Framework Convention on Climate Change (1992). The primary purpose of the Convention is to establish methods to minimize global warming and in particular the emission of greenhouse gases. The Convention was adopted in 1992 and came into force in 1994. Somalia acceded to the Convention in 2009. Somalia ratified the Kyoto agreement in 2010 and the Paris agreement in 2016.

United Nations Convention on Biological Diversity (1992). The Convention has three main goals including which are, the conservation of biological diversity (or biodiversity); the sustainable use of its components; and the fair and equitable sharing of benefits arising from genetic resources. Somalia acceded to the Convention in September 2009.

Convention on International Trade Against Endangered Species (CITES): The convention aims to protect endangered plants and animals. Somalia signed the Convention in 1985, and ratified it in 1986. It's current status is that of accession.

ILO Convention 182 on Worst Forms of Child Labor. Ratification of this Convention makes a country commit itself to taking immediate action to prohibit and eliminate the worst forms of child labor. Some predefined worst forms of child labor include sale of a child, trafficking of children, forced or compulsory labor, commercial exploitation of children, prostitution or the production of pornography, and work by its nature that is likely to harm the health, safety and morals of children. The Convention was ratified by Somalia in 2014.

Forced Labour Convention (1930/no. 29). The key objective of the Convention is to suppress the use of forced labor in all its forms. It defines forced labor as 'all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily'. The Convention has been in force in Somalia since 1960.

Rotterdam Convention: This is a multilateral treaty that came into effectiveness in 2004. The purpose is to promote shared responsibilities in relation to importation of hazardous chemicals. The convention promotes open exchange of information and calls on exporters of hazardous chemicals to use proper labelling, include directions on safe handling, and inform purchasers of any known restrictions or bans. Signatory nations can decide whether to allow or ban the importation of chemicals listed in the treaty, and exporting countries are obliged to make sure that producers within their jurisdiction comply

## **2.3 World Bank Environmental and Social Standards (ESS)**

The Environmental and Social Framework (ESF) sets out the World Bank's commitment to sustainable development, through a Bank Policy and a set of Environmental and Social Standards. Below is a short summary of the relevant Environmental and Social Standards (ESSs) for this sub-project<sup>5</sup>:

**ESS 1: Assessment and Management of Environmental and Social Risks and Impacts.** ESS1 sets out the Client's responsibilities for assessing, managing and monitoring environmental and social risks and impacts associated with each stage of a project supported by the Bank through Investment Project Financing, in order to achieve environmental and social outcomes consistent with the Environmental

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<sup>5</sup> ESS 7 and 9 do not apply to this project. There are no population groups that are included in the relevant criteria of ESS 7.

and Social Standards (ESSs). This ESS is relevant to this sub-project, and E&S risks and impacts are managed through this ESMP.

**ESS 2 – Labor and Working Conditions.** ESS2 recognizes the importance of employment creation and income generation in the pursuit of poverty reduction and inclusive economic growth. Borrowers can promote sound worker-management relationships and enhance the development benefits of a project by treating workers in the project fairly and providing safe and healthy working conditions. ESS2 applies to project workers including full time, part-time, temporary, seasonal and migrant workers. In order to mitigate risks and impacts in relation to labor and working conditions, the SCRP has prepared Labor Management Procedures (LMP), which are annexed to the ESMF.<sup>6</sup> This ESMP lists the relevant procedures.

**ESS 3 – Recourse and Efficiency, 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 gasses (GHG) threatens 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 GIIP.

**ESS 4 – Community Health and Safety.** ESS4 recognizes that project activities, equipment, and infrastructure can increase community exposure to risks and impacts. In addition, communities that are already subjected to impacts from climate change may also experience an acceleration or intensification of impacts due to project activities. Key risks and impacts of the sub-project in regards to community health and safety relate to GBV/SEA-H, pollution and security. Consistent with this, ESS4 addresses the health, safety, and security risks and impacts on project-affected communities and the corresponding responsibility to avoid or minimize such risks and impacts, with particular attention to people who, because of their particular circumstances, may be vulnerable. Risk mitigation measures are listed in this ESMP.

**ESS 5 – Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement.** ESS 5 recognizes that project-related land acquisition and restrictions on land use can have adverse impacts on communities and persons. Project-related land acquisition or restrictions on land use may cause physical displacement (relocation, loss of residential land or loss of shelter), economic displacement (loss of land, assets or access to assets, leading to loss of income sources or other means of livelihood), or both. The term “involuntary resettlement” refers to these impacts. Resettlement is considered involuntary when affected persons or communities do not have the right to refuse land acquisition or restrictions on land use that result in displacement. Both roads to be rehabilitated have street vendors along the roadside, who will face a loss of income during the rehabilitation. The mitigation of the related risks and impacts has been addressed in a separate Resettlement Action Plan (RAP)<sup>7</sup>.

**ESS 6 – Biodiversity Conservation and Sustainable Management of Living Natural Resources.** ESS6 recognizes that protecting and conserving biodiversity and sustainably managing living natural resources

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<sup>6</sup> SCRP, Environmental and Social Management Framework, amended August 2021.

<sup>7</sup> See SCRP, Resettlement Action Plan for Elwak and Dolow Roads, February 2022.

are fundamental to sustainable development. Biodiversity is defined as the variability among living organisms from all sources including, inter alia, terrestrial, marine and other aquatic ecosystems and the ecological complexes of which they are a part; this includes diversity within species, between species, and of ecosystems. Biodiversity often underpins ecosystem services valued by humans. Impacts on biodiversity can therefore often adversely affect the delivery of ecosystem services.

ESS6 recognizes the importance of maintaining core ecological functions of habitats, including forests, and the biodiversity they support. Habitat is defined as a terrestrial, freshwater, or marine geographical unit or airway that supports assemblages of living organisms and their interactions with the nonliving environment. All habitats support complexities of living organisms and vary in terms of species diversity, abundance and importance. The screening of this subproject has not indicated any impacts related to ESS6.

**ESS 8 – 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.

**ESS 10 – Stakeholder Engagement and Information Disclosure.** This ESS recognizes the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation. Stakeholder engagement has been undertaken for this sub-project, as listed below. In consideration of Covid-19 restrictions, the project has followed World Bank guidelines on community consultation under COVID-19.<sup>8</sup>

## **2.4. WBG Environmental, Health and Safety (EHS) Guidelines and technical notes**

The subproject will apply the WBG General EHS Guidelines from 2007, including the EHS Safety Guidelines for Toll Roads. These guidelines contain the performance levels and measures that are acceptable to the WB. When the national regulation differs from the levels and measures presented in these guidelines, the subproject will be required to achieve whichever is more stringent.

The following Good Practice Notes will also be consulted to ensure that mitigation measures developed are aligned with best industry practices: Addressing sexual exploitation and abuse and sexual harassment (SEA/SH) in investment projects financing involving in major civil works, 2020; Addressing Gender based violence in Investment Project Financing involving major civil works, 2018; Road safety, 2019; Assessing and managing the risks and impacts of the use of security personnel, 2018; Managing the risks of adverse impacts on communities from temporary project induced labor influx, 2016, WB EHS Guidelines on Traffic Safety; and .

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<sup>8</sup> <https://www.worldbank.org/en/news/factsheet/2020/12/01/citizen-engagement-and-stakeholder-consultations-during-covid-19>

The Technical Note produced by the WB following the pandemic “Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints of conducting public meetings” (2020), will also be used as a reference. This Technical Note makes due reference to the WHO technical guidance in dealing with COVID-19, including: (i) Risk Communication and Community Engagement Action Plan Guidance Preparedness and Response; (ii) Risk Communication and Community Engagement (RCCE) readiness and response; (iii) COVID-19 risk communication package for healthcare facilities; (iv) Getting your workplace ready for COVID-19; and (v) a guide to preventing and addressing social stigma associated with COVID-19.

## 2.4 Legal Gap Analysis

The following table presents a gap analysis between the World Bank ESS and applicable local laws and regulations including corrective measures to overcome gaps and responsibilities. For the project implementation, this project will rely fully on World Bank ESS, or whichever set of regulations is more stringent.

*Table 1 GAP Analysis World Bank ESS and National Legal Framework*

| ESF Objectives                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | National Laws and Requirements                                                                                                                                                                                                                       | Gaps                                                                                                                                | Recommended Actions                                                                                                                                                                       |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>ESS 1: Assessment and Management of Environmental and Social Risks and Impacts</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                      |                                                                                                                                     |                                                                                                                                                                                           |
| <p>Objectives of ESS 1 are:</p> <p>To identify, evaluate and manage the environment and social risks and impacts of the project in a manner consistent with the ESSs.</p> <p>To adopt a mitigation hierarchy approach to:</p> <p>(a) Anticipate and avoid risks and impacts;</p> <p>(b) Where avoidance is not possible, minimize or reduce risks and impacts to acceptable levels;</p> <p>(c) Once risks and impacts have been minimized or reduced, mitigated; and</p> <p>(d) Where significant residual impacts remain, compensate for or offset them, where technically and financially feasible.</p> <p>To adopt differentiated measures so that adverse impacts do not fall disproportionately on the disadvantaged or vulnerable, and they are not disadvantaged in sharing development benefits and opportunities resulting from the project.</p> | <p>Provisional Constitution of the Federal Republic of Somalia. Article 12 of the Constitution addresses public assets and natural resources.</p> <p>Article 43 provides guidelines on environmental and social safeguards that can be observed.</p> | <p>Laws have not been developed yet</p> <p>ESIAs not incorporated in federal law yet, and not strong in State-level legislation</p> | <p>An E&amp;S Screening process has been followed for this sub-project in order to assess whether activities require environmental and social assessments. An ESMP has been prepared.</p> |

| ESF Objectives                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | National Laws and Requirements                                                                                                                                                                                                                                                                                                                                                                                                                                         | Gaps                                                                                                                                                             | Recommended Actions                                                                                                                                                                                                                                                                                                                                                                                       |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>To utilize national environmental and social institutions, systems, laws, regulations and <b>procedures in the assessment, development</b> and implementation of projects, whenever appropriate.</p> <p>To promote improved environmental and social performance, in ways which recognize and enhance Borrower capacity.</p>                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>ESS 2: Labor and Working Conditions</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                           |
| <p>The Objectives of ESS 2 are:</p> <p>To promote safety and health at work.</p> <p>To promote the fair treatment, non-discrimination and equal opportunity of project workers.</p> <p>To protect project workers, including vulnerable workers such as women, persons with disabilities, children (of working age, in accordance with this ESS) and migrant workers, contracted workers, community workers and primary supply workers, as appropriate.</p> <p>To prevent the use of all forms of forced labor and child labor.</p> <p>To support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law.</p> | <p><u>Provisional Constitution of the Federal Republic of Somalia</u>. Article 14 stipulates that a person may not be subjected to slavery, servitude, trafficking, or forced labor for any purpose.</p> <p>Article 24.5 stipulates that all workers, particularly women, have a special right of protection from sexual abuse, segregation and discrimination in the work place. Every labor law and practice shall comply with gender equality in the work place</p> | <p>The new labor code, amending the code from 1972, has not been passed yet. The implementation of the existing articles in practice may not be very strong.</p> | <p>The sub-project does not allow any forced and child labor. It will hold all contractors liable to the implementation of the LMP. The PIU will have overall responsibility to monitor the implementation of the LMP.</p> <p>The LMP spells out a workers' grievance redress mechanism; and the GBV Action Plan provides referral pathways for cases of GBV. This subproject will implement the LMP.</p> |

| ESF Objectives                                                                | National Laws and Requirements                                                                                                                                                                                                                                                                                                                                                 | Gaps | Recommended Actions                                                                                   |
|-------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|-------------------------------------------------------------------------------------------------------|
| To provide project workers with accessible means to raise workplace concerns. | Human trafficking: A person may not be subjected to slavery, servitude, trafficking or force labour offences. Every labour law shall comply with gender equality. Dismissal for pregnancy. All women have a special right of protection from discrimination.                                                                                                                   |      |                                                                                                       |
|                                                                               | <u>The Labour Code of 1972</u> stipulates that all contracts of employment must include a) the nature and duration of the contract; b) the hours and place of work; c) the remuneration payable to the worker; and c) the procedure for suspension or termination of contract. Furthermore, all contracts must be submitted to the competent labor inspector for pre-approval. | n/a  | The sub-project will fully comply with WB ESS 2. This is set out in the LMP.                          |
|                                                                               | <u>The Labour Code of 1972.</u><br>The employer is obligated to provide adequate measures for health & safety protecting staff against                                                                                                                                                                                                                                         | n/a  | The sub-project will apply OHS management system that is consistent with the WBG General EHSs on OHS. |

| ESF Objectives | National Laws and Requirements                                                                                                                                                                                                                                                         | Gaps                                                                                                                                                                                                              | Recommended Actions                                                                                   |
|----------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------|
|                | related risks, including the provisions 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                                                                     |                                                                                                                                                                                                                   |                                                                                                       |
|                | <u>The Labour Code of 1972.</u> Workers have the right to submit complaints and the employer must give the complaints due consideration.                                                                                                                                               | n/a                                                                                                                                                                                                               | This ESMP sets out a workers' grievance redress mechanism.                                            |
|                | <u>The Labour Code of 1972.</u> Remuneration must be adequate in view of the quality and quantity of the work delivered, and must be non-discriminatory in regards to age, gender and other aspects. Maximum number of working hours per week are 8 hours per day and 6 days per week. | Women are restricted from being employed in night work, and the specific types of work prohibited for women may be prescribed by decree.<br><br>No provisions on the protection of the rights of domestic workers | The Project will comply with the national law and WB ESS 2. This is set out in the LMP and this ESMP. |
|                | <u>The Labour Code of 1972.</u> Some work is considered dangerous and unhealthy                                                                                                                                                                                                        | n/a                                                                                                                                                                                                               | The Project will only allow deployment from the age of 18 (see LMP).                                  |

| ESF Objectives | National Laws and Requirements                                                                                                                                                                                                                                 | Gaps                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Recommended Actions                                                                                                                                                          |
|----------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                | and forbidden for women and youth (defined as 15-18 years of age). This includes the carrying of heavy weight or work at night.                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                              |
|                | <p><u>The Labour Code of 1972.</u> The Labor Code forbids work for children below the age of 12, but allows employment of children between the age of 12-15, yet employment has to be compatible with proper protection, health and the moral of children.</p> | <p>Children are deployed in worst forms of child labor (forced recruitment by army, forced labor in domestic work, agriculture and herding, breaking rocks for gravel, construction work, commercial sexual exploitations)</p> <p>However, Somalia made efforts to construct a rehabilitation center for former child combatants and establish a Human Trafficking and Smuggling Task Force.</p> <p>Children are further deployed in agriculture (farming, herding livestock, fishing); industry (construction, mining and quarrying); services (street work, working as maids in hotels, domestic work, voluntary recruitment</p> | <p>The Project will only allow deployment – in all project worker categories – from the age of 18 (see LMP). Rigorous monitoring will ensure the application of the LMP.</p> |

| ESF Objectives                                                                                                                  | National Laws and Requirements                                                                                                                                                                                                                               | Gaps                                                                                                                                                                                                                                                                                                                                                        | Recommended Actions                                                                                    |
|---------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------|
|                                                                                                                                 |                                                                                                                                                                                                                                                              | <p>of children by army); children also perform dangerous tasks in street work</p> <p>Laws do not identify hazardous occupations or activities prohibited for children, and child trafficking for labor and commercial sexual exploitation is not criminally prohibited.</p> <p>Government does not employ labor inspectors and conducts no inspections.</p> |                                                                                                        |
|                                                                                                                                 | <p><u>The Labour Code of 1972.</u> 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 union.</p> | n/a                                                                                                                                                                                                                                                                                                                                                         | The sub-project will follow national law and ESS 2.                                                    |
| ESS 3: Resource Efficiency and Pollution Prevention and Management                                                              |                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                             |                                                                                                        |
| <p>The Objectives of ESS 3 are:<br/>To promote the sustainable use of resources, including energy, water and raw materials.</p> | <p><u>Provisional Constitution of the Federal Republic of Somalia.</u> Somalia passed its Provisional Constitution in</p>                                                                                                                                    | <p>Laws in support of the Constitution are still not available. Implementation of the laws and Constitution may</p>                                                                                                                                                                                                                                         | <p>The Project will promote the sustainable use of resources and avoid or minimize adverse impacts</p> |

| ESF Objectives                                                                                                                                                                                                                                                                                                              | National Laws and Requirements                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Gaps                                              | Recommended Actions                                                                                                         |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------|
| <p>To avoid or minimize adverse impacts on human health and the environment by avoiding or minimizing pollution from project activities.</p> <p>To avoid or minimize project-related emissions of short and long-lived climate pollutants.</p> <p>To avoid or minimize generation of hazardous and non-hazardous waste.</p> | <p>2012. Article 12 of the Constitution addresses public assets and natural resources.</p> <p><u>Provisional Constitution of the Federal Republic of Somalia</u>. Article 25 of the Constitution 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.</p> <p>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.</p> <p><u>Provisional Constitution of the Federal Republic of Somalia</u>. Article 45 states that the Government shall give priority to the protection, conservation, and preservation of the environment against</p> | <p>be hampered due to the weak justice system</p> | <p>on human health according to the Constitution and the WB's ESS3.</p> <p>Detailed measures are laid out in this ESMP.</p> |

| ESF Objectives | National Laws and Requirements                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Gaps | Recommended Actions |
|----------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|---------------------|
|                | <p>anything that may cause harm to natural biodiversity and the ecosystem.</p> <p>The same Article further states that 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.</p> <p>Article 45: 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,</p> |      |                     |

| ESF Objectives                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | National Laws and Requirements                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Gaps                                                                                                                                                                                                                                                  | Recommended Actions                                                                                                                                                                                                                                                   |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | among other measures.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                       |
| <b>ESS 4: Community Health and Safety</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                       |
| <p>The Objectives of ESS 4 are:</p> <p>To anticipate and avoid adverse impacts on the health and safety of project-affected communities during the project life-cycle from both routine and non-routine circumstances.</p> <p>To avoid or minimize community exposure to project-related traffic and road safety risks, diseases and hazardous materials.</p> <p>To have in place effective measures to address emergency events.</p> <p>To ensure that the safeguarding of personnel and property is carried out in a manner that avoids or minimizes risks to the project-affected communities.</p> <p>To promote quality and safety, and considerations relating to climate change, in the design and construction of infrastructure, including dams</p> | <p><u>The Somali Penal Code of 1962</u>. The Code criminalizes rape and other forms of sexual violence as well as forced prostitution. Articles 398-9 provide that ‘carnal intercourse’ and ‘acts of lust omitted with violence’ are punishable with 5-15 years and 1-5 years of imprisonment. Abduction for the purpose of lust or marriage is prohibited under Art 401.</p> <p>Art 39(i) makes abuse of power in the commission of a crime an aggravating circumstance and Article 33 provides that when a superior officer orders the commission of an offence both the perpetrator and his superior will be liable</p> | <p>The Somali Penal Code of 1962 fails to protect survivors and prosecute perpetrators</p> <p>The crimes under Articles 398-9 are too narrowly defined to satisfy international law standards of protection from sexual and gender based violence</p> | <p>Although the Project aims to improve the lives of previously affected communities, it needs to be ensured that Project activities do not pose any unintended negative consequences on communities. This ESMP includes risk mitigation measures to this regard.</p> |

| ESF Objectives | National Laws and Requirements                                                                                                                                                                                                                                                                                                                                                                        | Gaps | Recommended Actions                                                                                                                                                                                                                                                                                                                       |
|----------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                | n/a                                                                                                                                                                                                                                                                                                                                                                                                   | n/a  | Several measures will be undertaken, including contractors will develop road safety management plan and a Health and Safety Plan as part of the CESMP to address the impacts on local communities of moving construction equipment; measures and actions developed to assess and manage specific risks and impacts outlined in the ESMPs. |
|                | <p><u>Provisional Constitution of the Federal Republic of Somalia</u>. 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.</p> <p>Furthermore, all people have a duty to safeguards and enhance the environment and participate in the</p> |      |                                                                                                                                                                                                                                                                                                                                           |

| ESF Objectives                                                                                                                                                                                                                                                                                                                                                                                          | National Laws and Requirements                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Gaps                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Recommended Actions                                                                                                                                                                                                               |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                                                                                                                                                                                                                                         | development, execution, management, conservation and protection of the natural resources and the environment.                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                   |
| <b>ESS 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement</b>                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                   |
| <p>The Objectives of ESS 5 are:</p> <p>To avoid involuntary resettlement or, when unavoidable, minimize involuntary resettlement by exploring project design alternatives.</p> <p>To avoid forced eviction.</p> <p>To mitigate unavoidable adverse social and economic impacts from land acquisition or restrictions on land use by providing timely compensation for loss of assets at replacement</p> | <p><u>Provisional Constitution of the Federal Republic of Somalia.</u> Article 26 states that every person has the right to own, use, enjoy, sell and transfer property.</p> <p>The State may compulsorily acquire property only if doing so is in the public interest. Any person whose property has been acquired in the name of the public interest has the right to just compensation from the State as agreed by the parties or decided by a court.</p> <p>Compensation is provided only for occupants of temporary structures.</p> | <p>There is a lack of detailed legislation governing land use and ownership</p> <p>Evictions are reported to be commonplace in Somalia</p> <p>ESS 5 recognizes three categories of Project Affected Persons, which are eligible for compensation: 1. Those with formal legal rights to land (including customary and traditional rights recognized under the laws of the country) 2. Those who do not have formal legal rights to land at the time of census, but have a claim that is recognized under</p> | <p>Where land is donated by private owners, a land donation agreement process is implemented.</p> <p>A Resettlement Policy Framework (RPF)<sup>9</sup> guides the development of site-specific RAPs. An RAP will be prepared.</p> |

<sup>9</sup> Federal Government of Somalia, Somalia Crisis Recovery Project, Resettlement Policy Framework, 2020.

| ESF Objectives | National Laws and Requirements                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Gaps                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Recommended Actions |
|----------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|
|                | <p>Affected persons are to be settled in suitable land and their eviction and settlement costs be paid for by the local government.</p> <p>Provisional Constitutions of Somalia (Article 43) call for consultation between the Mayor and the Planning Committee prior to the expropriation of private land</p> <p><b>The Agricultural Land Law (1975).</b> The law transfers all land from traditional authorities to the government. Individuals desiring land were to register their holdings within a 6 months period. The law does not recognize customary land holdings.</p> | <p>the laws of the country</p> <p>3. Those who have no recognizable legal right or claim to the land they are occupying.</p> <p>Those without legal title to land, including squatters and encroachers, are eligible for only limited protection under Somali laws and policies</p> <p>ESS 5 further defines types of losses to be compensated to include physical and economic displacements and cover land, residential or commercial structures, and lost income caused by temporary or permanent economic displacement</p> <p>While under Article 26, people have a right to be compensated, it is not clear how the amount for the compensation is determined. ESS 5 requires full replacement costs for all assets.</p> <p>Somali law does not</p> |                     |

| ESF Objectives                                                                                                                                                                                | National Laws and Requirements                                                                                             | Gaps                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Recommended Actions                                                                                 |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                               |                                                                                                                            | <p>determine compensation schedule and cut-off date.</p> <p>ESS 5 determines that improvements of the living situations of displaced vulnerable people should be undertaken, Somali Law does not provide for that.</p> <p>No meaningful consultations with project affected persons may take place, consultation mechanisms seem to make a preference in regards to governmental bodies rather than community stakeholders</p> <p>The Agricultural Land Law led to disparities between statutory tenure and actual land use and allocation.</p> |                                                                                                     |
| <b>ESS 10: Stakeholder Engagement and Information Disclosure</b>                                                                                                                              |                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                     |
| <p>The Objectives of ESS 10 are:</p> <p>To establish a systematic approach to stakeholder engagement that will help Borrowers identify stakeholders and build and maintain a constructive</p> | <p><u>Provisional Constitution of the Federal Republic of Somalia</u>. Article 32 stipulated that every person has the</p> | <p>The law on the right of access to information currently only exists as a draft</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <p>The sub-project has implemented stakeholder consultations and will continue to do so in line</p> |

| ESF Objectives                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | National Laws and Requirements                                                                                                                 | Gaps | Recommended Actions                                                                                                               |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------|------|-----------------------------------------------------------------------------------------------------------------------------------|
| <p>relationship with them, in particular project-affected parties.</p> <p>To assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be taken into account in project design and environmental and social performance.</p> <p>To 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.</p> <p>To 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 format.</p> <p>To provide project-affected parties with accessible and inclusive means to raise issues and grievances, and allow Borrowers to respond to and manage such grievances.</p> | <p>right of access to information held by the State. The Federal Parliament shall enact a law to ensure the right of access to information</p> |      | <p>with the Project Stakeholder Engagement Plan (SEP)<sup>10</sup></p> <p>The SCRP GRM is implemented in the sub-project area</p> |

<sup>10</sup><https://www.mof.gov.so/sites/default/files/2020-08/Stakeholder%20Engagement%20Plan%20%28SEP%29%20Somalia%20Crisis%20Recovery%20Project%20%28P173315%29.pdf>

### 3. Biophysical and Socio-Economic Environment

This section describes the overall baseline condition of Somalia, and Belet Hawa District in Jubaland State in specific, in terms of biophysical environment, as well as the socio-economic background. The target locations are the existing Elwak and Dolow Roads in Belet Hawa District.

#### 3.1. Proposed Project Location

The proposed Project is located along the northwestern border of Somalia with Kenya and Ethiopia, in Belet Hawa District, Jubaland State. The district is approximately 3900km<sup>2</sup>, and is located approximately 500km from the capital Mogadishu, it borders the the Kenya town of Mandera. Figure 1 below shows the location of the proposed projects, the Elwak Road and Dolow Road in Belet Hawa District. The proposed Elwak Road rehabilitation is 2km while the proposed Dolow Road rehabilitation is 3 km. The proposed projects are in Belet Hawa District.

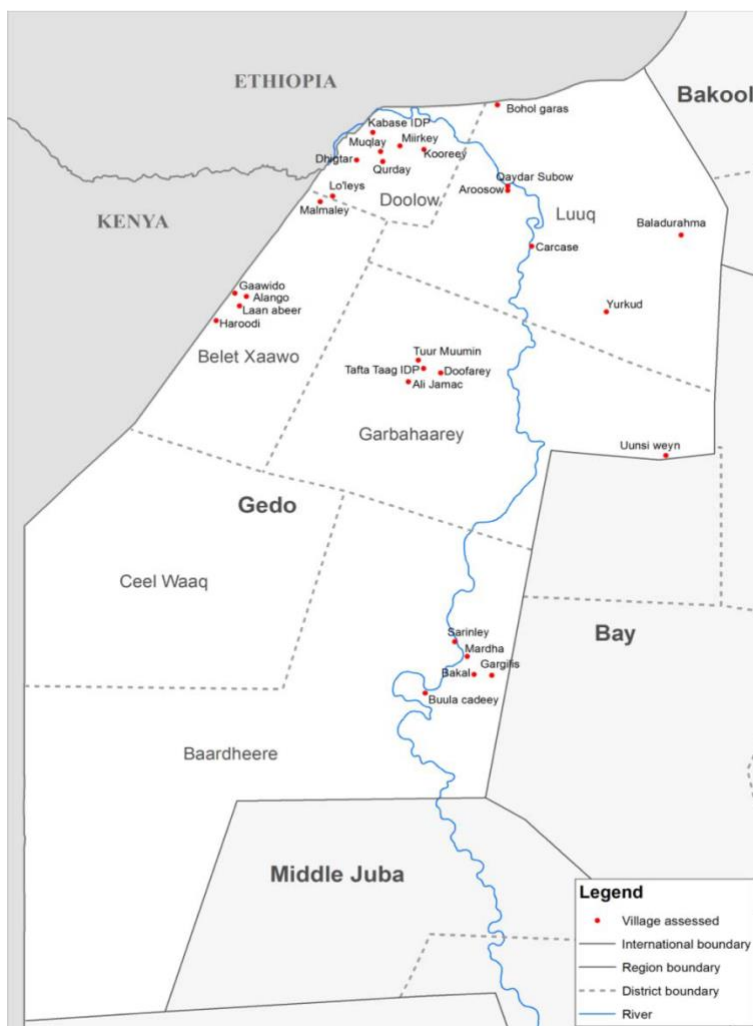


Figure 1 Belet Hawa (Belet Xaawo) in Jubaland State, Somalia

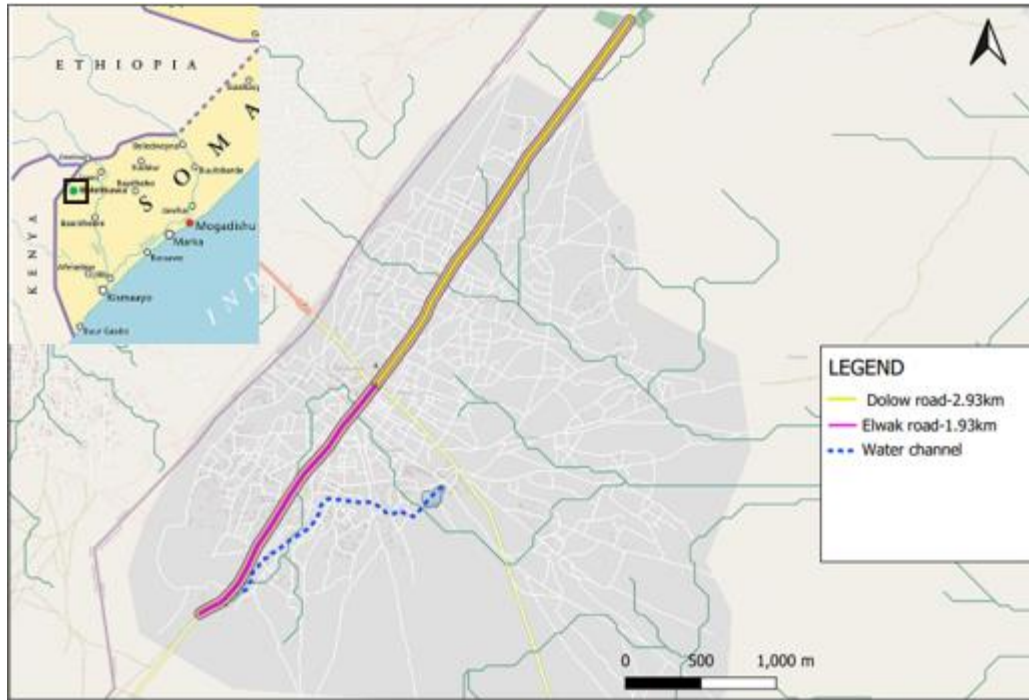


Figure 2 Location of Elwak and Dolow Roads in Belethawa

## 2.2 Physical Environment

**Topography:** Belethawa District, in which both roads are located, sits on a flat plain backed with a hilly ground on the southwestern side. The in situ soils are gravel with sections with sandy silt soils. There are hilly sections on the southwest with sedimentary rock, and they are the main source of building materials (rock) for the town. The hilly ground forms the catchment from which flood waters flow into town causing flooding and damage to the infrastructure including the project roads.

**Geology:** Key formations in Somalia include alluvium from the Pleistocene to Holocene period whose general characteristics show Older Pleistocene alluvial sediments and recent alluvium, including sandy clay with lenses of sand and fine gravel to coarse gravels and boulders. In some parts of the country are fine sands forming dunes and red soils and calcerites.

Quaternary unconsolidated sediments are mostly found in the southern coast and the riverine areas of Southern Somalia. The regional geology of the Belethawa area comprises the Luuq-Mandera sedimentary basin and the Garbaharey formation characterised by rock outcrops both formed in the Mesozoic era. The soils of the area overlying the rocks are mainly gravel, silty sands and silty clays. An extract of the geological map of the area is shown in figure 2 below.

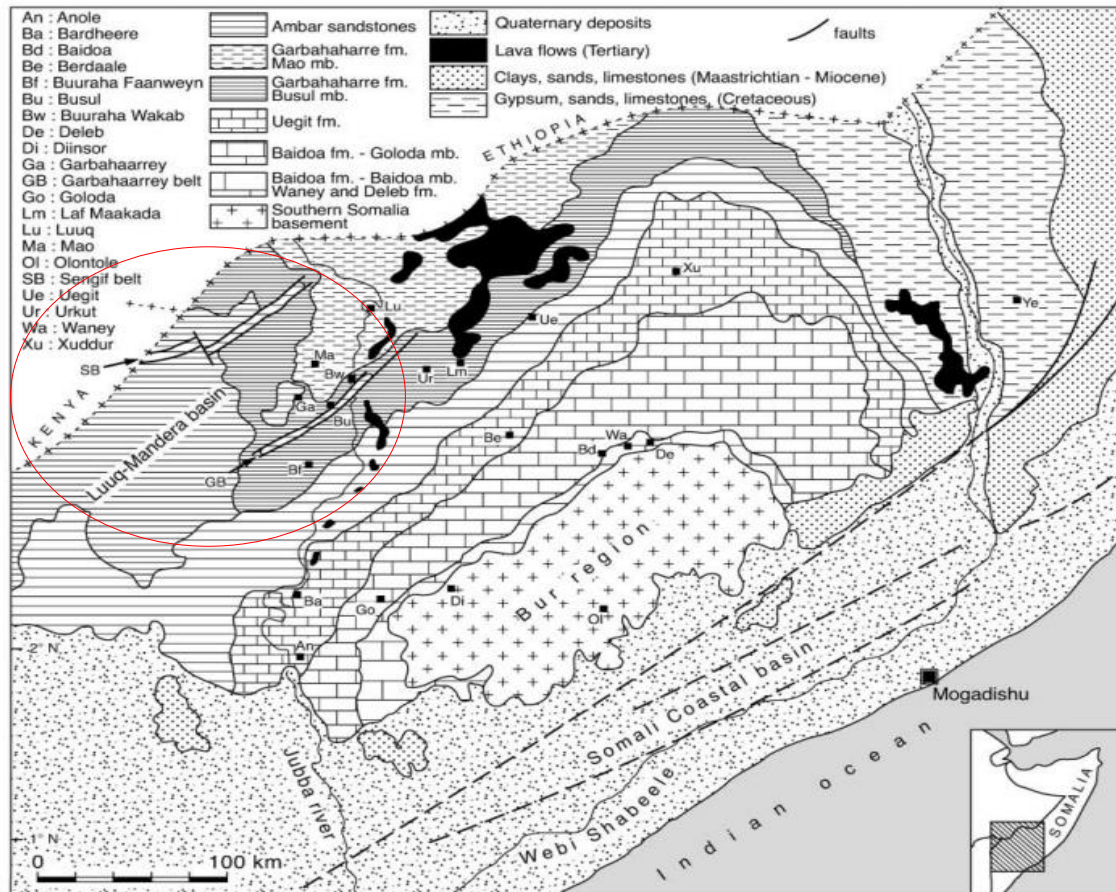


Figure 3 : An extract of the geological map of south-western Somalia

**Soils:** From laboratory tests carried out on the soils along Elwak Road and Dolow Road, the soils can be described as low plasticity clayey sands to high plasticity silty sands.

**Climate:** In general, Somalia has two rainy and two dry seasons. Precipitation data analysis for the period 1981 to 2020, the average monthly volume of rainfall was estimated at 20.89mm per month. The first rainy season begins in April and ends in May; the second rainy season begins in October and ends in November. The periods between December to March and June to September were noted as relatively dry periods. Belet Hawa received the highest amount of rainfall in 1981 when it recorded 198mm of rainfall.

The average maximum and minimum temperature between 1981 and 2020 were 37.35 °C and 21.90°C respectively. On average, the highest temperatures were recorded in March and September, and the lowest temperature was recorded during the months of December and January. According to *Graph 4*, the hottest month was February 2012, where the average maximum temperature was 42.8°C, and the minimum temperature was 17.5°C.

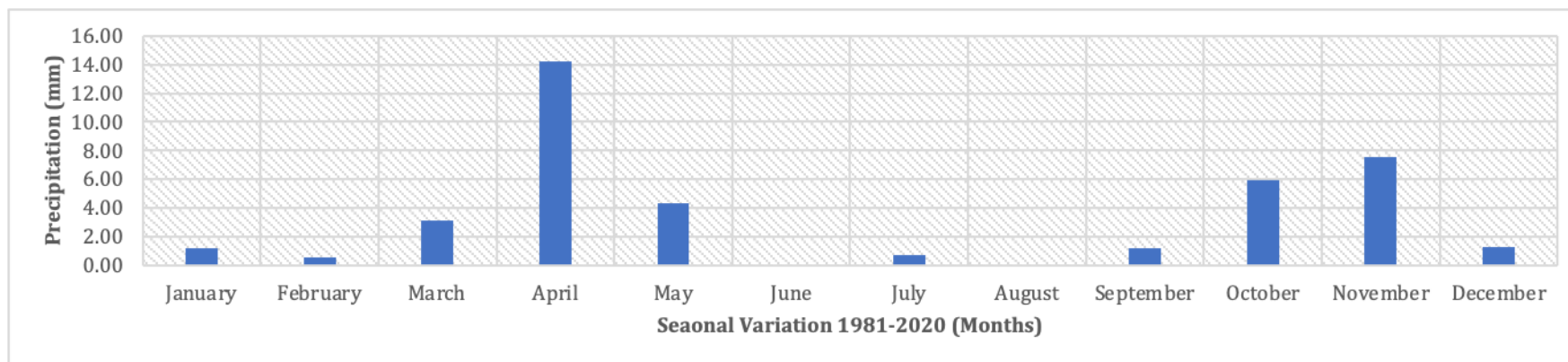


Figure 4 Seasonal Variation in precipitation between 1981 to 2020 in Belet Hawa District

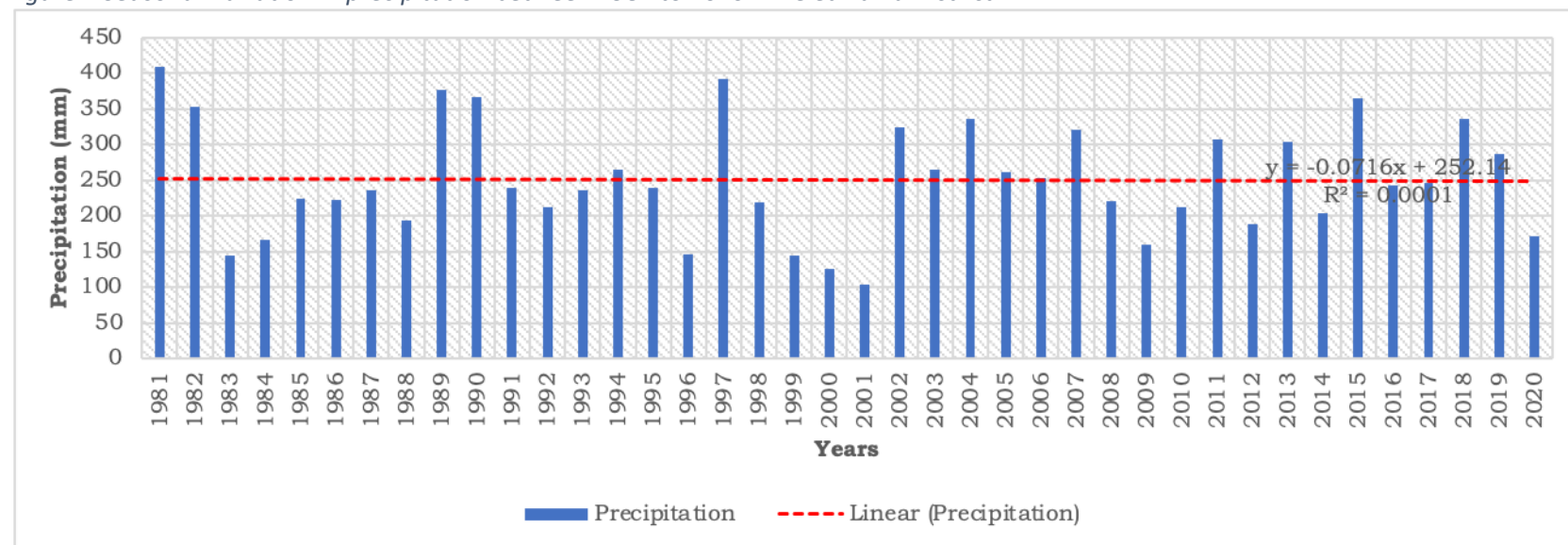


Figure 5 Annual total volume of precipitation between 1981 to 2020 in Belet Hawa District as per Belet Hawa station

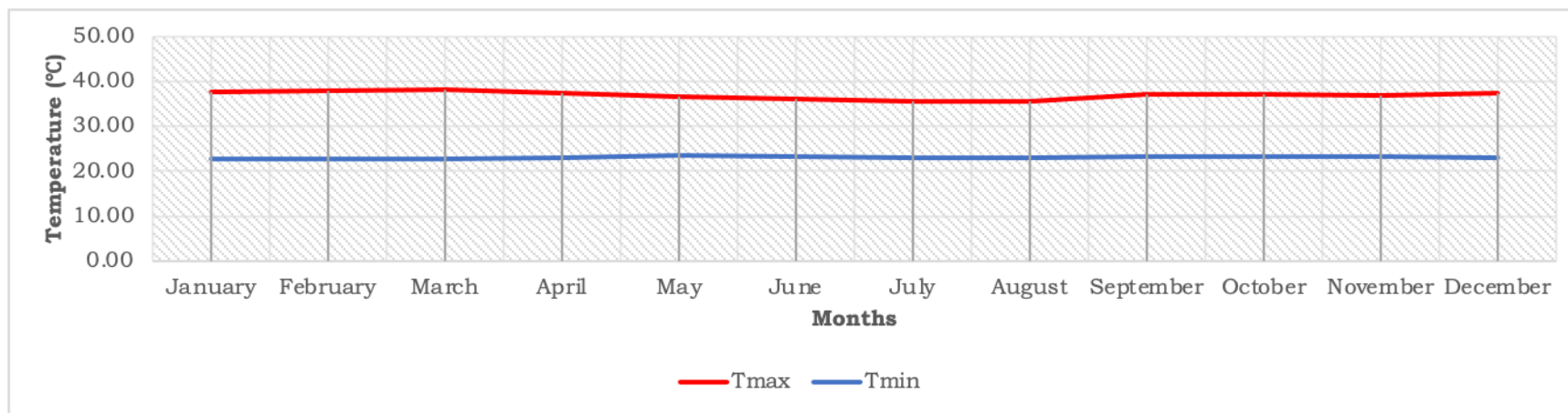
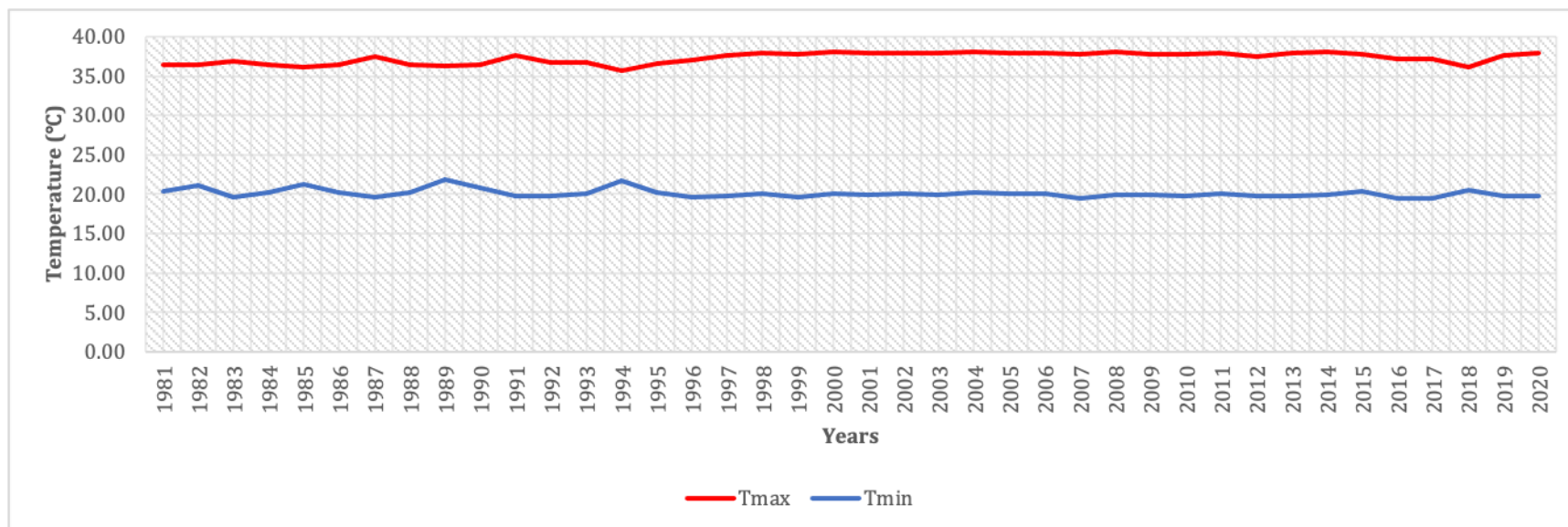


Figure 6 Seasonal Variation in temperature between 1981 to 2020 in Belet Hawa District

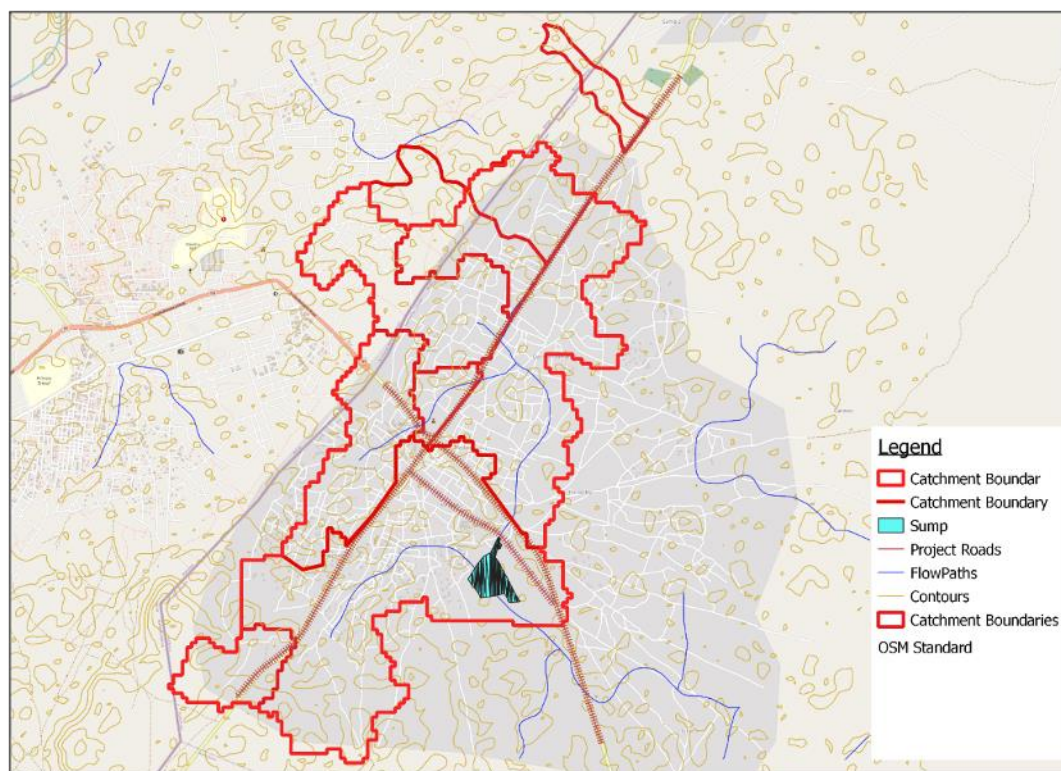


*Figure 7 Annual average temperature between 1981 to 2020 in Belet Hawa District*

**Water Resources and Hydrology:** Currently, the roads in Belet Hawa town do not have proper drainage structures. Due to the flat terrain, flood waters settle within the roads for long periods and eventually drains through seepage and evaporation. The lack of side drains along the roads exacerbates this situation. The road reserve in some sections of the roads is limited, which poses a challenge in construction of drainage structures. The most notable drainage structure is a box culvert across a gully along Elwak Road and a water sump along hospital road, which acts as the receiving body for the flood waters. The main catchment of flood waters through the town is from the hills South-West of the town which flow in a South-East direction and eventually drain into the Webi Jubba river.

The areas around the town are developed along drainage lines i.e., natural water course, making them susceptible to flooding in peak flood events. In addition, there are no wayleaves set aside to allow for the flood water to drain off these areas.

There are no river floods in Belet Hawa but overland flush floods which originate from a catchment of the southwestern side of town and flow into the town via flood channels. The project area lies within the greater Jubba basin which covers an area of about 749,000 km<sup>2</sup>. Drainageways within the project corridor primarily run south to the water pond located along the Hospital Road. Consequently, all of the contributing sub-catchments lie North of the project roads, with the outfall South of the Elwak road, Doolow road and immigration road; and West of Hospital Road and Garbahaarrey road. The individual catchment areas are shown as in Figure 3 below.



*Figure 8 Drainage area map*

The catchment areas intersecting the project roads were delineated using GIS software Global mapper<sup>11</sup> from the SRTM digital elevation model data.

The average slope percentage of the catchment area of the project area is 3.45%, which can be termed as moderate based on the TRRL classification presented below

- Moderate 1 - 4 %;
- Rolling 4 - 10 %;
- Hilly 10 - 20 %.

**Biological Environment:** Belet Hawa biodiversity has been badly damaged over the last few decades, due to the influx of people and a sudden increase in livestock, which added great pressure on the naturally rich but fragile ecosystems. Additionally, the ecology of most of the region is structurally fragile, due to the inherent nature of the soil and rainfall patterns.

Inhabitants are primarily pastoralists, and the area is home to several livestock species, including the Somali goat, Somali Sheep, and dromedary camels. The country has lost many of its wild mammals, such as elephants, to poaching. The main wild mammals found in Somalia include giraffes, zebra, and hyena. One of the most famous endemic mammals in the country is the long naked garanuug (*Litocranius walleri*). Other endemic mammals include the silver dik-dik (*Madoqua piacentinii*), one of the world's smallest antelopes, and the Somali golden mole (*Calcochloris tytonis*). The country has several reptile species, of which one of the most renowned is the *Bitis arietans Somalica*, commonly referred to as puff adder snake. Many Gecko species are also found in Somalia, including the endemic *Hemidactylus taylori*. The country is estimated to have several hundred bird species, including the ostrich and several dove species. None of these species are found on the project site.

### 3.3. Socio-Economic Environment

**Population:** According to the population census conducted by UNFPA in 2014, Belet Hawa District is estimate to have a total population of 83,116.

*Table 2 Population profile of Belet Hawa district*

| Region | District   | Total population | Urban population | Rural Population | IDP Population |
|--------|------------|------------------|------------------|------------------|----------------|
| Gedo   | Belet Hawa | 83,116           | 26,920           | 43,636           | 12,560         |

**Source: UNFPA 2014**

Around 15 percent of the population of Belet Hawa are urban, 80 percent are pastoral and agro-pastoral, and 5 percent are riverine. The most vulnerable societal groups are the pastoral and agro-pastoral ones, as they are depending on water and are usually significantly impacted by the frequent droughts.

**Administration and Governance:** Gedo region has a 32-member assembly body. The members are directly elected from the seven districts of the region with proportionality according to district population. The Gedo assembly or (Gollaha Gobalka Gedo) works with the federal government based in

<sup>11</sup> Global Mapper-Blue Marble Geographics (v19.0)

Mogadishu. Regional level posts include: Governor; Vice Governor; Inter-Regional Affairs Director; Director of Security Services; Gedo Regional Police Commander; Director of Education Services; Director of Agricultural Agency; Director of Economic Affairs; Livestock and Forestry Dept. Director; and Director of Justice and Religious Affairs.

Health Services: For the provision of medical services, Belet Hawa has one Maternal & Child Health Center and the Belet Hawa Hospital. With numerous IDPs having arrived in Belet Hawa District throughout the recent drought, health services are not sufficient for the population.

Education: Education in Belet Hawa is hampered by a lack of education infrastructure, human resources and books. Belet Hawa has a few schools, including Dawa, Oda and Al Qalam Primary Schools, and Cilmi Primary and Secondary School. It further has a Technical and Vocational Training Center.

Gender-Based Violence: A Rapid Assessment on GBV in Belet Hawa showed that there is a heightened GBV risk for displaced women and girls in Belet Hawa District, who currently live in shelters and without sufficient food, water and sanitation services. The main threat reported by respondents is sexual violence. Health services for GBV survivors are only available in Belet Hawa town, while some of the IDP camps are located far from town. There are no safety facilities available in the districts, and safety and security services for women are lacking as well.<sup>12</sup>

Vulnerability: The most vulnerable populations in Belet Hawa are the Internally Displaced People (IDPs). As of September 2021, 5 IDP sites were recorded in Belet Hawa District, hosting 3,112 households and 18,361 individuals. 56 percent of IDPs are women. 414 IDP are Persons with Disabilities.<sup>13</sup>

Road / infrastructure: Somalia has poor and deteriorating infrastructure. In 1996, there were 22,100 km of roads, of which only 2,608 km were paved. Most of the earth roads are unusable during the rainy season. Highways are so few that they do not link isolated regions of the country. There is also no railway network in the country (Chapin Metz 1992, Advameg 2010).

Elwak road is one of the main roads and heads southwest to Elwak. It is a gravel road in poor condition. The road terrain is flat within town and heads uphill on the outskirts of town. One section of the road serves the rural community (Stn 1+100 - Stn 1+980) and the other section is in Belet Hawa town (Stn 0+000 - Stn 1+100).

The road generally acts as a drainage channel during the rains. Sections have been washed out by flood waters running along and across the road. The low sections in town gets flooded and water stagnates for a while after the rains, causing damage to the road structure. This is mainly due to lack of outfall drains. There is one bridge along the road which is eroded and is insufficient to carry flood waters. This bridge needs replacement.

The existing soils and ground condition along this road is gravel and silty gravel soils suitable for subgrade.

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<sup>12</sup> UNFPA, GBV Rapid Assessment Belet Hawa District, Gedo Region, Somalia, 2020.

<sup>13</sup> OCHA, Somalia: Verified IDP sites in Belet Xaawo as of September 2021, accessed at: <https://reliefweb.int/report/somalia/somalia-verified-idp-sites-belet-xaawo-september-2021>



*Figure 9 Sample photos of Elwak Road*

Dolow road joins Elwak road inside Belethawa town and connects to Dolow, a farming community in the outskirts of Belethawa. It is currently a gravel road in poor condition due to lack of drainage infrastructure and a lack of drainage outfalls. Road bumps installed by the local community also contribute to pooling of water on the road causing further deterioration. One section of the road serves the rural community (Stn 1+200 - Stn 2+940) and the other section is in Belethawa town (Stn 0+000 - Stn 1+200)



*Figure 10 A section of Dolow Road, Belet Hawa town, can be seen in the background.*

The road has no side drains or any cross-drainage structures, the reason for the prevailing drainage issue.

Traffic: Both Dolow and Elwak roads pass through rural areas as well as Belet Hawa town CBD. The traffic is similar on both roads consisting of small vehicles private vehicles, small goods vehicles and donkey-drawn carts. The roads are lightly trafficked with no more than 200 vehicles per day in both directions. The town sections have pedestrian traffic as well.

## 4. Project Description

The medium-term flood recovery component, under the SCRP supports the rehabilitation of public and community infrastructure in line with “build-back-better” and climate-resilient standards. This component involves the rehabilitation of water and sanitation systems, broken or non-functioning pre-existing flood control systems (e.g., embankments, drainage, irrigation canals and restoration of river channels through dredging), health facilities, bridges, and small feeder roads.

### 4.1. Project Selection

Two roads, Dolow and Elwak have been selected for rehabilitation. The total length is 5km as shown in the table below:

*Table 3 Coordinates of Elwak and Dolow Roads*

| No    | Road name  | Coordinates              |                          | Length(Km) |
|-------|------------|--------------------------|--------------------------|------------|
|       |            | Start                    | End                      |            |
| 1     | Elwak Road | 3.928498°;<br>41.873902° | 3.914708°;<br>41.862936° | 2          |
| 2     | Dolow Road | 3.928815°;<br>41.874243° | 3.950592°;<br>41.889231° | 3          |
| Total |            |                          |                          | 5          |

Elwak and Dolow Roads meet criteria set out for C2 projects in the Project Appraisal Document (PAD) as explained below:

- The roads are damaged by local drainage flooding and impassable during the rainy seasons. The flooding is because the road is not engineered and lacks drainage infrastructure to keep it motorable in wet seasons.
- The inclusion of the Roads under C2 support has been requested by the State and the local administrations and supported during the local community consultation process
- Solution to the perennial flooding problem can be resolved by incorporating Build-back better principles i.e providing appropriate drainage facilities to ensure sustainability
- There are no identified security issues and the section of the road proposed for rehabilitation is accessible for the rehabilitation works implantation
- Based on the initial environmental and social screening undertaken, no major challenges are anticipated in ensuring environmental compliance. Temporary relocation of semi-permanent business stalls along the roads will be required. However, residents, small scall farmers and business owners in the town will benefit from improvement of the road. A resettlement action plan is being prepared separately to address this.
- The estimated cost of the rehabilitation works is within the available budget for C2 works in Jubaland State

Belethawa is not a riverine town. The flood damage on both Dolow and Elwak roads is caused by lack of drainage infrastructure such as side drains to collect runoff from the road and adjoining areas and culverts and outfalls to convey the runoff to disposal areas. In addition, the poor condition of the riding surface causes water to pool on the road resulting in further deterioration of the road pavement.

#### 4.2. Proposed Intervention

Both Dolow and Elwak roads serve the rural areas in the outskirts on the town as well as businesses and residents residing in the town. The proposed intervention will improve the road profile, road pavement and the surfacing, and the drainage provisions. The sections of the road in the town will receive a bituminous seal while the sections traversing the rural areas will be constructed as gravel roads.

The proposed rehabilitation will scarify the existing road up to 150mm and compact it to form the road subgrade. This will be followed by a base course of 150mm depth and a wearing course of 150mm. For the town section, surface dressing (chip seal) will be laid on the base course.

Drainage provisions include: cross pipe culverts are at low lying points. trapezoidal lined side drains with cover slabs for pedestrians through the semi-urban area, while open earth side drains (or slopes) will be provided through the rural section as part of rehabilitation works.

The geometrical elements of the road will remain the same except for improvements to the vertical alignment to improve visibility and drainage

#### 4.3. Project Activities

Design Phase: The design phase included the following activities:

- Road condition assessment - A team comprising a Road Engineer and support staff conducted an assessment mission on identified roads and infrastructure in Belet Hawa. The team visited Belet Hawa in April 2021 and assessed roads and infrastructure. This was a follow-up assessment after the initial reconnaissance assessment made by the advance team in February 2021.
- Road reserve: the ground team confirmed that the road reserve is not encroached and that there is sufficient width to fit the rehabilitated road. However, there were a number of temporary business stalls were noted on some sections of the road.
- Consultation - The stakeholder consultation involving both the State and local authorities and the local communities were conducted, by PIU and UNOPS staff.
- Surveying - collection of topographic data and developing a digital terrain model for design.
- Geotechnical Investigations - identification of material sites, carrying out in-situ material tests as well as collection of soil and construction materials samples for laboratory testing.

Road Design - In complying with the design standards, the geometric design has been carried out to improve the existing horizontal and vertical geometry while at the same time ensure that drainage of surface run-off is catered for. Road user safety and comfort has also been taken into consideration within the extent of the existing road alignment.

Typical cross sections of the two pavement types are illustrated below:

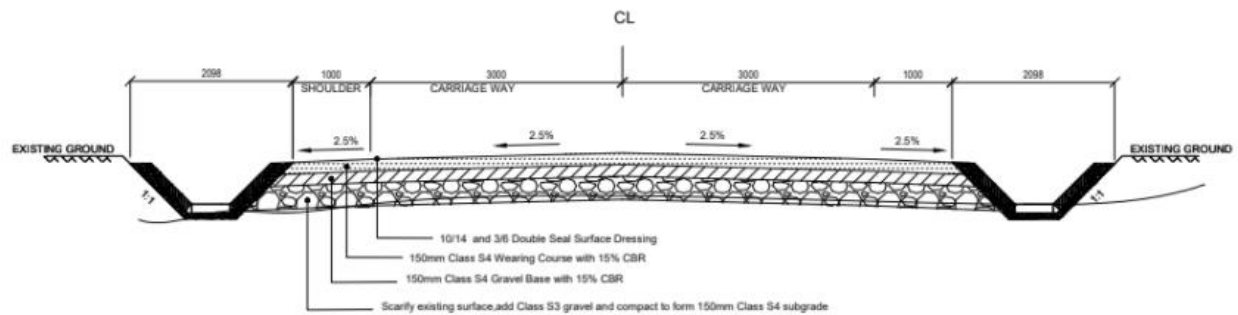


Figure 11 A typical cross section of the designed pavement for the town sections.

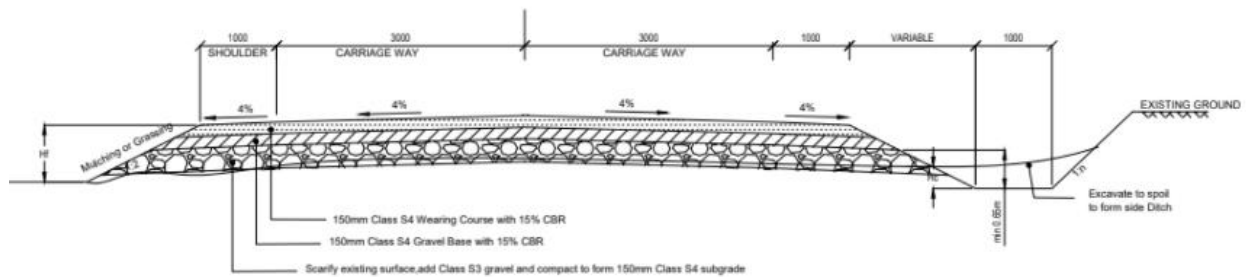


Figure 12 A typical cross section of the designed pavement for the rural sections.

- Design of drainage structures - The designed side drains of the roads are trapezoidal in shape with side slopes of 1H:1V. Hydrological analysis was performed on all the side ditches. The side ditches were designed to sufficiently channel run-off flows based on a 5-year return period. Several pipe culverts and one box culvert have been proposed as shown in the table below.

Table 4 List of drainage structures on Elwak and Doolow roads

| Road Name   | Approx. Location (km) | Structure Type | Height or Diameter (m) | No. | Discharge capacity (m <sup>3</sup> /s) | Remarks        |
|-------------|-----------------------|----------------|------------------------|-----|----------------------------------------|----------------|
| Elwak Road  | 1+925                 | PC             | 0.60                   | 2   | 0.78                                   | 2No. Ø600mm PC |
| Elwak Road  | 1+680                 | RCBC           | 1.5                    | 2   | 8.65                                   | 4m x 1.5m RCBC |
| Elwak Road  | 0+249                 | PC             | 0.60                   | 2   | 0.78                                   | 2No. Ø600mm PC |
| Doolow Road | 0+240                 | PC             | 0.90                   | 1   | 1.08                                   | 1No. Ø900mm PC |
| Doolow Road | 0+760                 | PC             | 0.60                   | 2   | 0.78                                   | 2No. Ø600mm PC |

|             |       |    |      |   |      |                |
|-------------|-------|----|------|---|------|----------------|
| Doolow Road | 1+140 | PC | 0.90 | 2 | 2.15 | 2No. Ø900mm PC |
| Doolow Road | 1+440 | PC | 0.90 | 1 | 1.08 | 1No. Ø900mm PC |
| Doolow Road | 2+380 | PC | 0.60 | 2 | 0.78 | 2No. Ø600mm PC |

**Construction Phase:** The construction of Dolow and Elwak roads will include the following construction activities:

- Construction of the Contractor's camp which will consist of offices, sanitation facilities equipment maintenance yard, materials and tools stores,
- Identification and construction of diversions and allowing for passage of traffic during works implementation in accordance with the traffic management plan approved by the Project Manager.
- Identification of material borrow sites for natural materials including gravel and aggregates and seeking requisite approvals.
- Identification of spoil areas for management of natural materials that are not suitable for incorporation into the works.
- Site clearance and topsoil stripping which consists of removing any vegetation within the construction width and organic matter in the top 150mm layer of soil. These activities are expected to be minimal since the design follows the existing alignment.
- Earthworks (approx. 10,650 m<sup>3</sup>) which include all activities undertaken to form the road foundation such as excavation, filling and compaction and construction of subgrade layers. The existing road surface will be scarified and reused in formation of the road foundation.
- Laying of a double seal surface dressing layer in the town section
- Construction of a neat gravel wearing course (150mm)
- Construction of a neat gravel base course (150mm)
- Construction of a box culvert, cross pipe culverts and access culverts
- Road furniture inclusive of road signs, road marking works (for the paved section), and installation of speed humps
- Creating awareness on solid waste management on site and consultations with the local authority on the disposal of the same at designated or licensed site

The Contractor will be expected to mobilise the following equipment:

| No. | Equipment Type and Characteristics                                           | Minimum Number Required |
|-----|------------------------------------------------------------------------------|-------------------------|
| 1.  | Vibrating Roller (10 tonnes)                                                 | 1                       |
| 2.  | Sheep foot Roller (10 tonnes)                                                | 1                       |
| 3.  | CAT 120H Motor Grader or Equivalent                                          | 2                       |
| 4.  | Excavator, (120 HP).                                                         | 1                       |
| 5.  | Self-propelled water tanker 4,500 litres minimum capacity with pick up pump. | 2                       |

|     |                                                                               |   |
|-----|-------------------------------------------------------------------------------|---|
| 6.  | 10 tonne tipper lorry                                                         | 6 |
| 7.  | Concrete Mixer (0.7m <sup>3</sup> /min)                                       | 2 |
| 8.  | Cat 950G Wheel Loader or Equivalent (2.9-4.4 m <sup>3</sup> bucket capacity). | 1 |
| 9.  | Bitumen distributor, 4000 litres capacity fitted with heaters and tachometer  | 1 |
| 10. | Chip- spreader, capable of covering 0.5 to 3.5m                               | 1 |
| 11. | Pneumatic roller, (above 2 tonnes)                                            | 1 |

The personnel expected to be mobilized during the construction phase are presented in the table below:

| Item No. | Position/specialization                                    | No. |
|----------|------------------------------------------------------------|-----|
| 1.       | Site Agent                                                 | 1   |
| 2.       | Surveyor                                                   | 1   |
| 3.       | Site Engineer                                              | 1   |
| 4.       | Environmental and Social Safeguards Specialist             | 1   |
| 5.       | Materials Technician                                       | 1   |
| 6.       | Construction Foreman - EarthWorks (2 positions)            | 2   |
| 7.       | Construction Foreman-Concrete Works (1 Position)           | 1   |
| 8.       | Construction Foreman - Asphalt Concrete Works (1 Position) | 1   |
| 9.       | Unskilled Workers                                          | 25  |

Operation Phase: The operational phase activities will include:

- Creating awareness on road safety to ensure reduced or no cases of accidents on the roads and ensuring proper road usage by both the drivers and the community.
- Routine and periodic road inspection and maintenance to increase longevity. Drainage inspection and maintenance to reduce or avoid flooding incidences.
- Maintenance of trees and any vegetation planted during the construction phase.
- Maintenance of road signs.

Material sites will be identified by the contractor at implementation stage.

## 5. Environmental and Social Risks and Impacts

This section lists the anticipated positive and adverse impacts associated with the Elwak Road and Dolow Road rehabilitation project.

### 5.1. Positive Impacts

The primary beneficiaries of this sub-project is the population in rural areas, including farmers, agropastoralists, pastoralists, and rural IDPs (displaced due to various factors and living among host communities in rural areas) that benefit from the infrastructure. The rehabilitation of Elwak Road and Dolow Road, will remedy damages done by flooding and will contribute to more stable road infrastructure in Belet Hawa District. In particular, it will provide an important transport route connecting urban and rural areas. The Road will improve accessibility to health, education and other services in town for the rural populations.

### 5.2. Negative Risks and Impacts

The activities associated with the rehabilitation of Elwak Road and Dolow Road will likely generate adverse site-specific risks and impacts, such as:

#### Construction Phase

- Management and disposal of material generated from construction activities during the construction phase,
- Increased level of dust, noise and vibration from moving of construction vehicles and machinery,
- Increased level of air pollution through operation of heavy equipment and vehicles for construction,
- Generation of construction waste, which consists mainly of soil that is unsuitable for construction e.g black cotton soil, waste from vehicle and equipment maintenance.
- Sourcing of materials, an activity which may degrade the surrounding environment,
- Security for project operations including the protection of project workers and beneficiaries,
- Labor influx and associated risks such as GBV/SEAH, specifically for women. The majority of the labour force will be unskilled which can be sourced locally.
- Risks associated with labor rights and management, e.g., child labor or forced labor, specifically for children.
- Occupational health and safety of workers both during the construction and operational phases, specifically for workers recruited from the community.
- Challenges in access to beneficiaries for meaningful stakeholder and community engagements as well as grievance redress and monitoring, specifically for vulnerable groups (such as women, minority clan members etc..)
- Traffic risks during construction,
- Limitations in effective community engagements and participation,
- Security for project operations including the protection of project-affected persons,
- Community health and safety risk: traffic safety, water and sanitation safety, life and fire safety, protection from COVID-19.

- Risk of floods

Operational Phase:

- Increased level of noise from increase in traffic
- Road traffic safety risks
- Soil erosion

More generally, the near-complete lack of environmental legislation in Somalia, and the lack of capacity of the Government to monitor and implement environmental risk mitigation and protection, and the inaccessibility of some of the geographical areas, pose significant risks.

In regards to Dolow Road, there are further land and resettlement impacts, given the street vendors that settle every day on the side of the road. In order to mitigate these risks and impacts a separate Resettlement Action Plan (RAP) has been prepared.

## **6. Environmental and Social Mitigation Measures**

The table below lays out the specific adverse risks and impacts anticipated for the project, lays out the respective mitigation measures required to reduce or eliminate the projected project impacts. This matrix forms the core of the ESMP, since it shows exactly what must be done and by whom. See Annex 3 for an E&S Monitoring template.

Table 5: Environmental and Social Management Plan

| WB ESF                                                                                | E&S Risks and Impacts                                                                                                                                                                                                                                                                                                                 | Mitigation Measures                                                                                                                                                                                                                                                                                                             | Responsibility | Budget for mitigation (in USD)                         | Monitoring Indicator                                               | Monitoring Frequency                                       |
|---------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|--------------------------------------------------------|--------------------------------------------------------------------|------------------------------------------------------------|
| <b>ESS 1: Assessment and Management of Environmental and Social Risks and Impacts</b> |                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                 |                |                                                        |                                                                    |                                                            |
| <b>ESS 1</b>                                                                          | <b>Preparation Phase</b>                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                 |                |                                                        |                                                                    |                                                            |
|                                                                                       | Access to beneficiaries for meaningful stakeholder and community engagements as well as grievance redress and monitoring will be a challenge, as Project location is in a remote underserved areas with basic physical and community infrastructure devastated by drought and floods. (applies to preparation and construction phase) | <ul style="list-style-type: none"> <li>Implement SEP and create awareness of GRM</li> </ul>                                                                                                                                                                                                                                     | SPT / PIU      | Included in PIU staff costs<br><br>Travel costs: 2,000 | # of GRM cases filed<br><br># of stakeholder engagements conducted | at the beginning of activity and throughout implementation |
|                                                                                       | <b>Construction Phase</b>                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                 |                |                                                        |                                                                    |                                                            |
|                                                                                       | Implementation of the respective mitigation measures against the negative impacts identified in this ESMP                                                                                                                                                                                                                             | <ul style="list-style-type: none"> <li>Provide H&amp;S Training to the construction workforce (including sub-contractors, temporary workers and drivers)</li> <li>Raise awareness to the workforce regarding the implementation of the ESMP tailored to the project scope, through toolbox talks and other platforms</li> </ul> | Contractor     | 1,000 USD for logistics                                | # of H&S Training session<br><br># of awareness raising session    | At the beginning of construction activity                  |
| <b>ESS 2: Labour and Working Conditions</b>                                           |                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                 |                |                                                        |                                                                    |                                                            |
| <b>ESS 2</b>                                                                          | <b>Construction Phase</b>                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                 |                |                                                        |                                                                    |                                                            |

| WB ESF | E&S Risks and Impacts                                                                                                                   | Mitigation Measures                                                                                                                                                                                                                                                                                                                  | Responsibility   | Budget for mitigation (in USD)         | Monitoring Indicator                                                                                                       | Monitoring Frequency              |
|--------|-----------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|----------------------------------------|----------------------------------------------------------------------------------------------------------------------------|-----------------------------------|
|        | Risk of Insecurity of all project workers                                                                                               | <ul style="list-style-type: none"> <li>Project Implementation Unit (PIU) to prepare District Security Risk Assessment</li> <li>PIU to prepare local Security Management plan (SMP)</li> <li>Contractor to prepare local Activity Security Plan</li> <li>Implementation of SMP and local Activity Security Plan</li> </ul>            | PIU / Contractor | Costs for security risk implementation | # District Security Risk Assessments<br><br># of Local Security Management Plans<br><br># of Local Activity Security Plans | Prior to commencement of activity |
|        | Risk of labor and working conditions of all the workers don't comply with WB and Somali legislation.                                    | <ul style="list-style-type: none"> <li>Implement and monitor the LMP</li> <li>Listing of all staff and titles, new hires and departure</li> <li>Site visited and records reviewed, major findings, and actions taken by contractor, engineer, or others, including authorities—to include date, inspector or auditor name</li> </ul> | Contractor       | Incl in contractor staff costs         | Availability of register<br><br>Availability of log book showing site visited and actions taken                            | monthly                           |
|        | OHS risks, including impacts of dust, noise, vibration, hot work, site traffic, ergonomics, extreme temperatures, communicable diseases | <ul style="list-style-type: none"> <li>Provide hearing protection where necessary (when sound level over 8 hours reaches 85 dB(A))</li> <li>Use of acoustic insulating materials, isolation of noise source, and other</li> </ul>                                                                                                    | Contractor       | Incl. in contractor budget             | % of workers that have been provided with hearing protection<br><br># of equipment                                         | monthly                           |

| WB ESF | E&S Risks and Impacts | Mitigation Measures                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Responsibility | Budget for mitigation (in USD) | Monitoring Indicator                                                                                                                                                                                                                                                                                                                                       | Monitoring Frequency |
|--------|-----------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|--------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|
|        |                       | <p>engineering controls</p> <ul style="list-style-type: none"> <li>Control vibration through choice of equipment, installation of vibration dampening pads or devices, and m=limiting the duration of exposure</li> <li>provide temporary shelters to protect against the elements during working activities or for use as rest areas.</li> <li>Monitor weather forecast for outdoor work</li> <li>Adjust work and rest periods according to temperature</li> <li>Training and licensing of industrial vehicle operators in the safe operation of specialized vehicles.</li> <li>Ensure drivers undergo medical surveillance</li> <li>Establish rights of way, site speed limits, vehicle inspection requirements, operating rules and procedures</li> <li>Use of mechanical assists to eliminate or reduce exertions required to lift materials, hold tools and work objects</li> </ul> |                |                                | <p>with vibration dampening pads or devices</p> <p># of temporary shelters available</p> <p># of trainings for industrial vehicle operators conducted</p> <p>% of heavy vehicle operators that have been subjected to medical surveillance</p> <p># of site speed limit signs at construction site</p> <p># of rest and stretching breaks per work day</p> |                      |

| WB ESF | E&S Risks and Impacts                                                                  | Mitigation Measures                                                                                                                                                                                                                                                     | Responsibility | Budget for mitigation (in USD) | Monitoring Indicator                                                                   | Monitoring Frequency          |
|--------|----------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|--------------------------------|----------------------------------------------------------------------------------------|-------------------------------|
|        |                                                                                        | <ul style="list-style-type: none"> <li>Incorporate rest and stretching breaks into work processes and conduct job rotation</li> <li>Implement quality control and maintenance programs that reduce unnecessary forces and exertions</li> </ul>                          |                |                                |                                                                                        |                               |
|        | Risk of labor influx leads to increase of GBV cases                                    | <ul style="list-style-type: none"> <li>All workers to sign CoCs before commencement of their assignment (see annex 4)</li> <li>Dedicated reporting channel for victims through Project GRM</li> </ul>                                                                   | Contractor     | Incl in contractor staff costs | % of workers that signed COCs                                                          | At start of project           |
|        | Risk of discrimination against women in employment                                     | <ul style="list-style-type: none"> <li>Contractor to develop recruitment and retention policies that enable fair working conditions and women's safe and equitable participation.</li> <li>All workers to sign CoCs before commencement of their assignment.</li> </ul> | Contractor     | Incl in staff costs            | # of recruitment and retention policies available<br><br>% of workers that signed COCs | At start of project           |
|        | Risk of delayed payment or underpayment of workers, leading to complaints and conflict | <ul style="list-style-type: none"> <li>Ensure provision of timely payment</li> <li>Ensure provision of workers' GRM</li> </ul>                                                                                                                                          | Contractor     | Incl in contractor staff costs | % of payments made on time<br><br># of workers' grievances filed                       | Monthly                       |
|        | Risks of child and forced labor resulting in employing of                              | <ul style="list-style-type: none"> <li>Set-up of a workers' GRM to ensure their voices /</li> </ul>                                                                                                                                                                     | Contractor     | Incl in contractor staff costs | # of GRM cases filed                                                                   | Throughout the project's life |

| WB ESF | E&S Risks and Impacts                                                                                           | Mitigation Measures                                                                                                                                                                                                                                                                                                    | Responsibility | Budget for mitigation (in USD) | Monitoring Indicator                                                                                        | Monitoring Frequency                                   |
|--------|-----------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|--------------------------------|-------------------------------------------------------------------------------------------------------------|--------------------------------------------------------|
|        | underage children and human trafficking                                                                         | <ul style="list-style-type: none"> <li>complaints are heard</li> <li>Contractor to maintain staff records, ID copies.</li> </ul>                                                                                                                                                                                       |                |                                | # of child and forced labor reported                                                                        | cycle                                                  |
|        | Risk of spreading COVID 19 at workplace                                                                         | <ul style="list-style-type: none"> <li>Contractor to ensure workers have access to face masks and sanitizers.</li> <li>Regular sensitization on COVID 19 to ensure workers observe the social distancing especially when in the community and public places</li> </ul>                                                 | Contractor     | Incl in contractor staff costs | # of sites with face masks and sanitizer available<br><br># of sensitization session                        | Prior to activity commencement and throughout activity |
|        | Risk of workers being unaware of the dangers at the site (quarries, construction site etc...) leading to injury | <ul style="list-style-type: none"> <li>Regular review and provision of PPE to the project sites. The PPE includes but not limited to: safety boots, safety goggles, hard hats, gloves, dust masks, reflective jackets, overalls and dust coats.</li> <li>Workers' GRM in place</li> <li>Regular fire drills</li> </ul> | Contractor     | Contractor's budget            | # of regular reviews conducted<br><br># of grievances logged<br><br># of fire drills conducted              | Monthly                                                |
|        | Risk of traffic and road safety for Project workers                                                             | <ul style="list-style-type: none"> <li>Include traffic and road safety into the daily toolbox talks.</li> <li>Emphasize safety aspects among drivers</li> <li>Improve driving skills of drivers</li> <li>Requiring licensing of</li> </ul>                                                                             | Contractor     |                                | # of daily toolbox talk that include road safety talks<br><br># of accident reports<br><br># of register of | monthly                                                |

| WB ESF                                                                    | E&S Risks and Impacts                | Mitigation Measures                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Responsibility | Budget for mitigation (in USD)                      | Monitoring Indicator                                                                               | Monitoring Frequency |
|---------------------------------------------------------------------------|--------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|-----------------------------------------------------|----------------------------------------------------------------------------------------------------|----------------------|
|                                                                           |                                      | <p>drivers</p> <ul style="list-style-type: none"> <li>• Adopt limits for trip duration, e.g. 8 hours at a time</li> <li>• Arrange driver rosters to avoid overtiredness</li> <li>• Preassign routes by construction vehicles (project management, contractor, and traffic authorities) before construction starts.</li> <li>• Regular maintenance of vehicles and use of manufacturer approved parts to minimize potentially serious accidents caused by equipment malfunction.</li> </ul> |                |                                                     | vehicle maintenance                                                                                |                      |
| <b>ESS 3: Resource Efficiency and Pollution Prevention and Management</b> |                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                |                                                     |                                                                                                    |                      |
| <b>ESS 3</b>                                                              | <b>Construction Phase</b>            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                |                                                     |                                                                                                    |                      |
|                                                                           | Impacts of generation of solid waste | <ul style="list-style-type: none"> <li>• Ensure disposal of generated solid waste at designated and authorized disposal site consistence with the local and international requirements (see</li> </ul>                                                                                                                                                                                                                                                                                     | Contractor     | waste management costs 10,000 USD lump sum per site | <p># of records of amount of solid waste disposed, where and when</p> <p># of grievances filed</p> | monthly              |

| WB ESF | E&S Risks and Impacts                                                     | Mitigation Measures                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Responsibility | Budget for mitigation (in USD) | Monitoring Indicator                                           | Monitoring Frequency |
|--------|---------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|--------------------------------|----------------------------------------------------------------|----------------------|
|        |                                                                           | <p>WBG General EHS Guidelines)<sup>14</sup></p> <ul style="list-style-type: none"> <li>• Ensure mechanisms exist for community to bring forth any complaints/feedback concerning the waste disposal by the contractor – Project GRM</li> <li>• Carry out disposal of solid waste in a manner that does not negatively affect the drinking water sources, cultivation fields, irrigation channels, natural drainage paths, wetlands and critical habitat, the existing waste management system in the area, local routes, and general aesthetic value of the area</li> </ul> |                |                                | # of records of amount of solid waste disposed, where and when |                      |
|        | Risk of poor sanitation facilities and sanitation conditions at work site | <ul style="list-style-type: none"> <li>• Provide proper water closet toilet facilities at all long</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Contractor     | 5,000 USD                      | # of water closet toilet facilities available                  | monthly              |

<sup>14</sup> WBG EHS Guidelines, Waste Management, accessed at: <https://www.ifc.org/wps/wcm/connect/456bbb17-b961-45b3-b0a7-c1bd1c7163e0/1-6%2BWaste%2BManagement.pdf?MOD=AJPERES&CVID=nPtgwEW>

| WB ESF | E&S Risks and Impacts                                                   | Mitigation Measures                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Responsibility | Budget for mitigation (in USD) | Monitoring Indicator                                                                                                                                                                                                     | Monitoring Frequency                                      |
|--------|-------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|--------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------|
|        |                                                                         | <p>term (&gt; 1 month) work sites.</p> <ul style="list-style-type: none"> <li>Do not allow water to run out at toilets.</li> <li>Maintain all toilets in clean and sanitary condition.</li> <li>Provide proper earth pit latrines at all work sites where work will be undertaken for periods of up to one month.</li> <li>Fill the latrines in once they become full and when site work is complete.</li> <li>Do not allow site workers to defecate in the open anywhere on the site or in its vicinity.</li> <li>Add the use of sanitation arrangements in toolbox talks</li> </ul> |                |                                | <p>% of toilets leaking</p> <p>Toilets are well maintained</p> <p># of latrines provided</p> <p>% of latrines filled</p> <p># of workers openly defecating</p> <p># of toolbox talks including Sanitary arrangements</p> |                                                           |
|        | Risk of pollution from construction wastes and water use on groundwater | <ul style="list-style-type: none"> <li>Through accurate estimation of the sizes and quantities of materials required, order materials in the sizes and quantities</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                          | Contractor     | Incl in contractor staff costs | <p># of construction materials left over at the end</p> <p>% of waste at construction site is disposed of</p>                                                                                                            | Commencement of project and throughout the project cycle. |

| WB ESF | E&S Risks and Impacts | Mitigation Measures                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Responsibility | Budget for mitigation (in USD) | Monitoring Indicator                                                        | Monitoring Frequency |
|--------|-----------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|--------------------------------|-----------------------------------------------------------------------------|----------------------|
|        |                       | <p>they will be needed, rather than cutting them to size, or having large quantities of residual materials.</p> <ul style="list-style-type: none"> <li>• Ensure that construction materials left over at the end of construction will be used in other projects rather than being disposed of.</li> <li>• Ensure that damaged or wasted construction materials will be recovered for refurbishing and use in other projects</li> <li>• Donate recyclable/reusable or residual materials to local community groups, institutions and individual locals or home owners.</li> <li>• Dispose waste more responsibly by dumping at designated dumping sites or landfills only.</li> <li>• Waste collection bins to be provided at designated points on</li> </ul> |                |                                | <p>appropriately</p> <p># of waste bins available at construction sites</p> |                      |

| WB ESF                                    | E&S Risks and Impacts                                                          | Mitigation Measures                                                                                                                                                                                                                                                                                                                                                                                                              | Responsibility | Budget for mitigation (in USD)     | Monitoring Indicator                                                                                                   | Monitoring Frequency               |
|-------------------------------------------|--------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|------------------------------------|------------------------------------------------------------------------------------------------------------------------|------------------------------------|
|                                           |                                                                                | site                                                                                                                                                                                                                                                                                                                                                                                                                             |                |                                    |                                                                                                                        |                                    |
|                                           | New Material sites and borrow pits                                             | <ul style="list-style-type: none"> <li>Once material sites and borrow pits are identified and selected, the process followed to activate it should fulfill all applicable ESF requirements in terms of specific environmental assessments and where necessary update ESMP or add in C ESMP.</li> <li>Upon works completion rehabilitate borrow pits and quarries;</li> <li>Only licensed borrow pits will be selected</li> </ul> | PIU/Contractor | 5000USD                            | Availability of adequate E&S plan that includes rehabilitation for management of new quarries and borrow pits in place | Before activity commencement       |
| Operational Phase                         |                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                  |                |                                    |                                                                                                                        |                                    |
|                                           | Risk of soil erosion                                                           | <ul style="list-style-type: none"> <li>Mulching to stabilize exposed areas</li> <li>(re)-vegetation of soil areas</li> </ul>                                                                                                                                                                                                                                                                                                     | Contractor     | 3000 USD                           | % of soil areas have been vegetated                                                                                    | After finalization of construction |
| <b>ESS 4: Community Health and Safety</b> |                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                  |                |                                    |                                                                                                                        |                                    |
| <b>Construction Phase</b>                 |                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                  |                |                                    |                                                                                                                        |                                    |
| <b>ESS 4</b>                              | Risk of increased GBV/SEAH cases and risks of sexual exploitation and abuse or | <ul style="list-style-type: none"> <li>Implementation and monitoring of GBV / SEA Action Plan</li> </ul>                                                                                                                                                                                                                                                                                                                         | PIU            | Incl in PIU staff and travel costs | Activities under GBV/SEA Action Plan                                                                                   | monthly                            |

| WB ESF | E&S Risks and Impacts                                                                                       | Mitigation Measures                                                                                                                                                                                                                               | Responsibility | Budget for mitigation (in USD)     | Monitoring Indicator                                                                                                                            | Monitoring Frequency        |
|--------|-------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|
|        | sexual harassment, such as requests for sexual favors by project workers                                    | <ul style="list-style-type: none"> <li>GBV awareness sessions for community</li> <li>GBV awareness sessions for workers. Engage a dedicated specialist to support oversight and management of these risks</li> <li>Workers to sign COC</li> </ul> |                |                                    | implemented<br><br># of GBV awareness sessions<br><br># of sessions<br><br># of specialists engagement<br><br>% of workers that have signed CoC |                             |
|        | Risk of spread of communicable diseases (SILs , HIV/AIDS, COVID-19 etc..) between workers and the community | <ul style="list-style-type: none"> <li>Community awareness sessions on communicable diseases</li> <li>Implement COVID-19 protection measures</li> </ul>                                                                                           | PIU            | Incl in PIU staff and travel costs | # of community sensitization<br><br>% of workers that have signed CoC<br><br>% or works with access to face masks and sanitizer                 | monthly                     |
|        | Risk of floods                                                                                              | <ul style="list-style-type: none"> <li>Elevation</li> <li>drainage</li> </ul>                                                                                                                                                                     | Contractor     | Incl. in contractor budget         | 0 flooding reported                                                                                                                             | monthly                     |
|        | Risk of exposure of community members to physical hazards on project sites.                                 | <ul style="list-style-type: none"> <li>Sensitize the local community on the activity of type project and inform them about construction risks and the restricted access to</li> </ul>                                                             | Contractor     | Inc in Contractor budget           | # of sensitization measures for communities<br><br># of signage available around construction site                                              | At commencement of activity |

| WB ESF | E&S Risks and Impacts           | Mitigation Measures                                                                                                                                                                                                                                                                                                                                                                                      | Responsibility | Budget for mitigation (in USD) | Monitoring Indicator                                                                                                                                                                       | Monitoring Frequency |
|--------|---------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|--------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|
|        |                                 | <ul style="list-style-type: none"> <li>the site</li> <li>Restrict access to construction site through signage</li> <li>Remove hazardous conditions on construction sites that cannot be controlled effectively with site access restrictions, such as covering openings to small confined spaces, ensuring means of escape for larger openings</li> <li>Locked storage of hazardous materials</li> </ul> |                |                                | % of small openings that have been covered<br><br>% of larger openings that have an escape opening<br><br># of locked storage for hazardous materials                                      |                      |
|        | Risk of traffic and road safety | <ul style="list-style-type: none"> <li>Safety/warning signage, safety barrier around the construction site, and safe driving practices ()</li> <li>Include traffic road safety into the daily toolbox talks</li> <li>Emphasize safety aspects among drivers</li> <li>Require licensing of drivers</li> <li>Adopt limits for trip durations and arrange driver rosters to avoid</li> </ul>                | Contractor     | Inc in Contractor budget       | # of signage<br><br># of toolbox talks that include road safety issues<br><br>% of drivers that are properly licensed<br><br># of Driver rosters<br><br># of maintenance logs for vehicles | monthly              |

| WB ESF | E&S Risks and Impacts                               | Mitigation Measures                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Responsibility | Budget for mitigation (in USD) | Monitoring Indicator                                                                                                                 | Monitoring Frequency |
|--------|-----------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|--------------------------------|--------------------------------------------------------------------------------------------------------------------------------------|----------------------|
|        |                                                     | overtiredness <ul style="list-style-type: none"> <li>• Preassign routes for project traffic</li> <li>• Regular maintenance of vehicles to minimize potential for accidents.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                  |                |                                |                                                                                                                                      |                      |
|        | Impacts of dust, air pollution and noise generation | <ul style="list-style-type: none"> <li>• High level maintenance of the vehicles to reduce the vibrations</li> <li>• Selecting equipment with lower sound power levels</li> <li>• Installing suitable mufflers on engine exhausts and compressor components</li> <li>• equipment casing</li> <li>• Planning activities in consultation with local communities so that activities with the greatest potential to generate noise are planned during periods of the day that will result in least disturbance.</li> <li>• Suitable wet suppression techniques need to be utilized in all exposed</li> </ul> | Contractor     | Inc in Contractor budget       | % of vehicles well maintained<br><br>% of engine exhausts with mufflers installed<br><br>% of activities implemented during the days | Throughout activity  |

| WB ESF                                                           | E&S Risks and Impacts                                                                                 | Mitigation Measures                                                                                                                                                                                                                                   | Responsibility    | Budget for mitigation (in USD) | Monitoring Indicator                                                            | Monitoring Frequency              |
|------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|--------------------------------|---------------------------------------------------------------------------------|-----------------------------------|
|                                                                  |                                                                                                       | areas <ul style="list-style-type: none"> <li>• All unnecessary traffic must be strictly limited on site speed controls are to be enforced</li> <li>• Monitor exhaust emissions to ambient air, waste pollutant releases to land and water.</li> </ul> |                   |                                |                                                                                 |                                   |
| Operational Phase                                                |                                                                                                       |                                                                                                                                                                                                                                                       |                   |                                |                                                                                 |                                   |
|                                                                  | Road traffic safety risk <sup>15</sup> s and increased noise level from increase in traffic           | <ul style="list-style-type: none"> <li>• Install signage for speed control in front of settlements</li> <li>• Safety/warning signage, safety barrier,</li> </ul>                                                                                      | Local Authorities | Municipal budget               | # of speed control signage<br><br># of safety/warning signs have been installed | throughout project implementation |
| <b>ESS 10: Stakeholder Engagement and Information Disclosure</b> |                                                                                                       |                                                                                                                                                                                                                                                       |                   |                                |                                                                                 |                                   |
| <b>ESS 10</b>                                                    | <b>Preparation and Construction Phase</b>                                                             |                                                                                                                                                                                                                                                       |                   |                                |                                                                                 |                                   |
|                                                                  | Risks of poor access to beneficiaries lead to less meaningful community engagements and difficulty in | <ul style="list-style-type: none"> <li>• Implementation of GRM</li> <li>• Monitoring of GRM</li> </ul>                                                                                                                                                | PIU               | PIU GRM costs                  | % of complaints filed have been addressed                                       | monthly                           |

<sup>15</sup> WB Good Practice Note on Road Safety

<https://thedocs.worldbank.org/en/doc/648681570135612401-0290022019/original/GoodPracticeNoteRoadSafety.pdf>

| WB ESF | E&S Risks and Impacts                                                                                           | Mitigation Measures                                                                                                                                           | Responsibility | Budget for mitigation (in USD)        | Monitoring Indicator                    | Monitoring Frequency |
|--------|-----------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|---------------------------------------|-----------------------------------------|----------------------|
|        | monitoring for social harm                                                                                      | solutions in a timely manner <ul style="list-style-type: none"> <li>• Use site-specific incident logs</li> <li>• Implement SEP</li> </ul>                     |                |                                       | # of site-specific incident los         |                      |
|        | Risks of lack of information on access to GRM leads to lack of accountability                                   | <ul style="list-style-type: none"> <li>• Awareness raising on GRM</li> </ul>                                                                                  | PIU            | PIU budget for GRM                    | # of awareness sessions of GRM          | quarterly            |
|        | Lack of information disclosure leads to lack of transparency and suspicions of mismanagement of the sub project | <ul style="list-style-type: none"> <li>• Conduct in- depth community engagement, providing information on the sub project</li> <li>• Implement SEP</li> </ul> | PIU            | PIU budget for stakeholder engagement | # of community engagement sessions held | quarterly            |

## 7. Institutional Arrangements and Responsibilities

### 7.1 Government Institutions

The work implementation will be managed by the Project Implementation Unit (PIU) embedded within the SCRP institutional structures. The PIU will be contracting a construction company directly to implement construction works. The construction company will implement the project including all Environmental and Social (E&S) mitigation measures defined in this ESMP.

Below is the list of Government institutions involved in the road rehabilitation works implementation, with their respective roles and interests.

*Table 6 Institutional partners' responsibilities*

|                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|-----------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Project Implementation Unit - PIU | <p>The application of mitigation measures required under this ESMP is the sole responsibility of the PIU. However, since actual construction works will be carried out by the private entity, the PIU will ensure that implementation of the ESMP is incorporated in the Request for Proposals (RfPs) and the costs are integrated in the Bill of Quantities (BoQs), and subsequently in the legal agreement between the construction company and the PIU. The PIU is responsible to instruct, observe and monitor its contractors against the ESMP provisions. The PIU should make sure that corrective actions are applied by the contractors, when necessary.</p> <p>The PIU can also undertake the monitoring itself if deemed necessary. The PIU will request for any violations to be corrected by the Constructor and monitor the actions and undertakings in correcting violations.</p> |
| State Project Team - SPT          | <p>The SPT's Environmental &amp; Social Safeguards Specialist will monitor the implementation of risk mitigation measures by the construction company. The monitoring will be supported by the PIU / SPT Engineers and the Community Consultation Specialist. Environmental and social monitoring reports will be prepared by the SPT and submitted to the PIU every month throughout the project duration.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| Ministry of Public Works (MoPW)   | <p>MoPW - the responsible State Ministry on all infrastructure development and maintenance has been engaged in the design development consultation and the certification process. The MoPW's technical staff will be engaged in the supervision of the work implementation by the Contractor.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| District Commissioner             | <p>The District Commissioner (Municipality) representing the local community and the interest will be engaged in the day-to-day coordination of the work implementation by the Contractor. The District</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |

|       |                                                                                                                                                                                                                             |
|-------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|       | Commissioner will be specifically involved in facilitating stakeholder engagements, assisting the Contractor in the recruitment of local workers and ensuring the security to the Contract staff and the supervision teams. |
| UNOPS | UNOPS Engineers and Safeguard team will be available to provide advisory level support to the PIU during the works implementation on technical and safeguard compliance related matters.                                    |

## 7.2 Contractor

The Contractor is responsible for complying with requirements for all field activities covered by this ESMP. Contractors to the SPT/PIU are also responsible for the actions of any subcontractors they may engage. Subcontractors also have to comply with all E&S standards as laid out in this ESMP. Contractors will have contractual clauses specifying adherence to the measures contained in the ESMP and WBG EHS Guidelines in addition to national requirements. In case of non-compliance, contracts can be ended. Contractor's responsibilities include:

- Ensure that all operations comply with the environmental and social standards laid out in this ESMP and in the Project's ESMF.
- Ensure that the control measures provided for in the ESMP are both understood and implemented by site personnel.
- Comply with accident and incident reporting as laid out in the ESMF. All severe incidents must be reported to the PIU within 48 hours of occurrence, including in the event of chance finds.
- Comply with chance find procedures (see Annex 5)
- Set up plans for action to be taken in the event of spills or leakages of hazardous materials, and other environmental emergencies.
- Monitor the ESMP implementation, against the monitoring indicators laid out in the ESMP Table.
- Participate in Community Consultative Meetings.
- Identify additional significant matters pertaining to environmental and social compliance.
- Liaise with the SPT/PIU Environmental and Social Safeguards Specialists on the need for corrective action in the event of unexpected environmental or social problems emerging during the course of operations.
- Communicate with all of the contractor's staff regarding environmental and social compliance requirements and other matters of importance. Contractors to communicate the same to sub-contractors
- Identify additional environmental mitigation or corrective measures that are deemed to be necessary during project implementation.
- Prepare of reports on all aspects of environmental and social compliance.
- Maintain lists of all workers, including their age and gender.
- Maintain a workers' grievance mechanism.

- Prepare and maintain an OHS Plan.
- Provide training to all workers on OHS Plan.
- Ensure signing of CoC by every worker, including issues of Sexual Harassment, Gender-Based Violence (GBV) and Sexual Exploitation and Abuse.

The contractor is obliged to implement this ESMP with all risk mitigation measures assigned to it.

E&S Safeguards or Environmental Health and Safety (EHS) Specialist: The contractor will deploy an E&S or EHS Specialist as an addition to the team to ensure operationalization of this ESMP, including monitoring, supervision and reporting on mitigation measures. The key tasks of the Specialist include:

- a) Ensure PPE for workers is available and workers are trained in its use
- b) Provide OHS training to all workers, based on the OHS Plan
- c) Ensure health and safety of all workers at the construction site
- d) If necessary, stop the works to ensure safety
- e) Maintain records of accidents and incidents and ensure appropriate reporting of incidents to the PIU/SPT
- f) Ensure waste management procedures are followed closely
- g) Ensure availability of water and sanitation facilities for all workers at site and at the camp site
- h) Conduct toolbox talks for workers
- i) Train all workers in the CoC and ensure that CoC is signed by every worker before commencement of their assignment.
- j) Liaise closely with the SPT/PIU Teams on training workers on GBV issues, as well as community awareness on GBV
- k) Maintain workers' lists indicating age and gender
- l) Liaise closely with the SPT/PIU Teams on the implementation of Project GRM
- m) Maintain records of workers' GRM

## 8. Reporting on ESMP Compliance

The PIU will prepare periodic monitoring reports, including inputs from the Contractor and the SPT, on the status of implementation of ESMP. The reports will be submitted to the World Bank for their review and feedback as part of the PIU's general Quarterly report to the Bank. Details of these reports and their content are given in Table below. A template for an Environmental and Social Monitoring report is included in Annex 3.

*Table ESMP Monitoring and Compliance Report*

| # | Title of the Report           | Contents of the Report                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Frequency of Report Preparation | Report to be prepared by |
|---|-------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|--------------------------|
| 1 | ESHS Monitoring Report to PIU | <p>Compliance status of the Project with the environmental and social mitigation and monitoring measures. The report should cover:</p> <ul style="list-style-type: none"> <li>• environmental incidents</li> <li>• health and safety incidents,</li> <li>• health and safety supervision:</li> <li>• Usage of PPEs by workers</li> <li>• Highlights of inspection</li> <li>• Training conducted and workers participated</li> <li>• Workers' grievances</li> <li>• Community grievances</li> <li>• Chance find (if any)</li> </ul> | Monthly                         | Contractor/SPT           |
| 2 | ESMP Monitoring Report to WB  | Compliance status of overall Project with ESMP requirements                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Quarterly                       | PIU                      |

| # | Title of the Report         | Contents of the Report                                                                                                                                                         | Frequency of Report Preparation                                                                                     | Report to be prepared by       |
|---|-----------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------|--------------------------------|
| 3 | Incident / Accident Reports | Incident investigation reports for all major incidents covering details of the incident, root cause analysis, and actions taken to address the future recurrence of this event | Initial investigation report for severe incidents within 24 hours.<br>Detailed Investigation Report within ten days | PIU<br>(contractor/SPT to PIU_ |

## 9. Capacity Building and Training

The proper implementation of the ESMP is highly dependent on the available existing capacity and awareness of the PIU, the SPT and the contractors' staff, the surrounding community and the concerned stakeholders.

Training workshops are required to increase the environmental awareness of all individuals concerned with the Project and to train and follow up with the workers who are specifically involved in the site operation.

On-site workers should receive appropriate training to undertake the duties of implementing the necessary mitigation measures. The training workshops should cover at least the following issues:

- Occupational and public health and safety.
- Mitigation measures to be applied.
- GBV/SEA/SH prevention
- HIV/AIDS prevention
- Proper handling and storage of hazardous material and wastes.
- Spill contingency plans
- Accidents and emergency plans
- Roll-out of GRM among workers and communities
- Appropriate segregation, transportation, final disposal of solid waste and fire safety.

This will be achieved by small workshops conducted in the induction phase for the workers. The induction training will include familiarization with the workers' GRM, Project GRM, CoC, GBV/SEA/SH, HIV/AIDS prevention, COVID-19 measures, and other toolbox talks as mentioned above in the ESMP. During the construction phase, refresher trainings will be held. While some

training will be provided by the contractor, the PIU has assessed that training on GBV/SEA/SH and GRM should be conducted by the PIU directly, given a potential lack of capacity among contractors.

## 9. Stakeholder Consultations

The preparation of the ESMP and of the project selection and design was highly dependent on stakeholder consultations, conducted as per the SCRP Stakeholder Engagement Plan (SEP)<sup>16</sup> and in accordance with Citizen Engagement and Stakeholder Consultations during COVID-19<sup>17</sup>.

On the 24<sup>th</sup> of February, 2021, the team composed of two engineers from UNOPS and the stakeholder engagement officer from PIU met with the local administration officials of Belet Hawa in the administration compound. The meeting was attended by the District Commissioner Abdirashid Abdi, Humanitarian/Projects coordinator Mohamed Farah Abdi, Secretary of Social Affairs Nor Adawe, Mayor of Belet Hawa Ali Geedi Barre, Auditor General Abdihakim Omar Barre, Commissioner of Youth & Sports Abdiwahid Hussein Osman and one member of the youth and sports group Abdifatah Abdullahi Omar.

According to the District Commissioner, Belet Hawa has an extremely poor drainage system, which is an addition to the flooding problem. After heavy rains, the floods from south mountains of Belet Hawo pour down to the center of the city and cause heavy flooding and this causes devastating impacts on infrastructure and also contributes to negative effects of a lack of roads, stresses transportation needs in the city and causes outbreaks of diseases. The DC suggested that 10KM of roads be built inside Belet Hawa that inter-link with each other, so effects of the flooding are reduced and citizens can finally travel smoothly. In 2017, the local community raised a fund to rehabilitate/construct 5km of road in the city center, while the International Organization for Migration (IOM) also contributed parts and supported the implementation of the project. However, most the gravel road is washed away or deteriorated by floods and this is due to a lack of a drainage system in the city, and a lack of flood-controlling mechanism, which were not in place.

The Mayor of the City gave his gratitude and thanked the team for coming to Belet Hawa in order to address problems and assist in development. He then suggested that drainage systems be created as soon as possible as the rainwater that pours down from the hills eventually trails to the center of the city and causes flooding, which has devastating impacts on the population including the overflowing of rivers, which floods farms and crops while damaging equipment, including motors that are costly.

### Community Consultations

On the 25<sup>th</sup> of February, the District Administration organized a community consultation for the consultation team to meet with all stakeholders in the community (see Annex 1).

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<sup>16</sup> SCRP Stakeholder Engagement Plan, 2020, accessed at: <https://www.mof.gov.so/sites/default/files/2020-08/Stakeholder%20Engagement%20Plan%20%28SEP%29%20Somalia%20Crisis%20Recovery%20Project%20%28P173315%29.pdf>

<sup>17</sup> <https://www.worldbank.org/en/news/factsheet/2020/12/01/citizen-engagement-and-stakeholder-consultations-during-covid-19>

**The Elders** in the district informed the team that floods and droughts have been devastating the district for some time. Furthermore, the hills to the south of Belet Hawa have caused severe floods in the city as well, as water flows down straight into the center of the city. They stressed that there is no drainage system within the city so there is no means for the water to leave, this means that the flooded water stays until it eventually dries up. This has caused outbreaks of diseases in Belet Hawa. The Elders also stated that there are no Gov't owned/public wells and that the few wells are privately owned, and that a public well is urgently needed.

**The women association** in the district stated that Belet Hawa is surrounded by hills, which unfortunately means that whenever it rains, water pours down from the hills and affects the city with floods. The women group also highlighted that this district only has 1 public hospital (Khaliil Hospital) and 2 MCH that are run by local NGO's. There is an urgent need for MCH, but the resources are inadequate. It was recommended that the old TB Hospital, which was government-owned has been left abandoned for over 30 years, and should be refurnished into a government-run MCH. The women group also stated that the wells are a far distance from the communities, which is difficult for mothers to gain access to and from the wells due to flood damaged passages/roads through rainfall. Furthermore, they stressed the need for a public well as private wells are expensive and not all households can afford them. They stressed the need for an Airport in Belet Hawa, this city is prone to border conflict, so if soldiers are wounded or other citizens are in need of medical care in the capital Mogadishu, they have to be driven 40KM to the airport in Dolow district, which has caused deaths previously.

**The youth** in the district informed the team that the biggest problem related to flooding in the district occurs from over-flowing of rivers and water pouring down from the hills, they then requested that a dam be built, which will benefit the communities as the water can then be utilized productively and floodings will not occur and sanitation of the city will not be affected negatively.

**The disability group** in Belet Hawa informed the team that there are no passages for them to commute from A to B when flooding occurs through rainfall and water flowing from the hills surrounding Belet Hawa, so they requested that drainage systems be installed. Additionally, the disability groups stated that there are no disability ramps or disability-friendly infrastructure in medical centers, so they requested if rehabilitations take place that ramps be installed.

**Finally, the IDP community** in Belet Hawa informed the team of their living conditions in Belet Hawa. They stated that there is only 1 public hospital and 2 MCHs in the district, which is a long distance away from the IDP camp they reside in, so they requested a local clinic/MCH to meet the medical needs of the locals. The IDP community also stated that whenever flooding or heavy rain occurs, they have to leave their settlements due to sewer damages caused by the flooding, so they requested an urgent solution to their housing crisis. They also stated that there are no educational facilities/opportunities for the IDPs.

Once the rehabilitation of the Belehawa Roads was decided on, follow-on site visits and stakeholder engagements were undertaken. Below is a summary of the stakeholder consultations carried out during the design development and approval process.

*Table Stakeholder consultation records*

| <b>Date</b>        | <b>Type of Consultation</b>                                                                            | <b>Stakeholders Consulted</b>                                                                                                                                                                                                                                    | <b>Issues discussed</b>                                                                                                                                                      |
|--------------------|--------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 25 February        | Stakeholder consultation and initial assessment visit to proposed project roads.                       | District Commissioner, Humanitarian/Projects Coordinator, Secretary of Social affairs, Mayor of Belehawa, Auditor General, Commissioner of youth and sports, a member of the youth and sports group, IDP representatives, representatives of women associations. | Prioritization of roads for rehabilitation works<br>Assessment of Security and accessibility<br>Beneficiaries' community - potential impact of reconstruction of the roads   |
| 7 - 9 April 2021   | Technical Assessment of proposed roads by UNOPS Road Engineer                                          | Regional administration, Belehawa Municipality /commissionaires, Community                                                                                                                                                                                       | 1- road damage assessment<br>2- priority areas.<br>3- level of road accessibility.<br>4 context and environmental and safeguard issues.<br>5- Social impacts and priorities. |
| 21 – 26 April 2021 | Geotechnical and topographical data collection of project roads by UNOPS Material Engineer & Surveyors | Regional administration, Belehawa Municipality /commissionaires, Community                                                                                                                                                                                       | Collection of geotechnical data and samples of materials for testing<br>Carrying out topographical survey.                                                                   |
| 9 – 12 Sept 2021   | UNOPS Drainage Engineer assessment of proposed roads                                                   | Regional administration, Belehawa Municipality /commissionaires, Community                                                                                                                                                                                       | Assessment of drainage system to incorporate to the design.                                                                                                                  |
| 8 December 2021    | Client Review: Technical Review of the Detailed Design                                                 | Jubaland State (Ministry of Public Works)                                                                                                                                                                                                                        | Detailed designs were reviewed and approved by the MoPW.                                                                                                                     |

| Date        | Type of Consultation                            | Stakeholders Consulted                       | Issues discussed                                                         |
|-------------|-------------------------------------------------|----------------------------------------------|--------------------------------------------------------------------------|
|             | Review (via email)                              |                                              |                                                                          |
| On-going    | C2 COP meetings                                 | PIU, World Bank & UNOPS - technical meetings | Planning, consultation, design standards, implementation scheduling etc. |
| In progress | World bank technical review of the road designs | World Bank Technical Lead                    | Pending                                                                  |

Additional stakeholder consultations were undertaken for the preparation of the RAP in order to mitigate impacts on the street vendors of the Belet Hawa Roads. The details of these consultations are presented in the RAP.

## 10. Grievance Redress Mechanisms

Under the new World Bank ESSs, Bank-supported projects are required to facilitate mechanisms that address concerns and grievances that arise in connection with a project.<sup>18</sup> One of the key objectives of ESS 10 (Stakeholder Engagement and Information Disclosure) is ‘to provide project-affected parties with accessible and inclusive means to raise issues and grievances, and allow borrowers to respond and manage such grievances’.<sup>19</sup> This Project GRM facilitates the Project to respond to concerns and grievances of the project-affected parties related to the environmental and social performance of the project. The SCRP provides mechanisms to receive and facilitate resolutions to such concerns. This section lays out the grievance redressal mechanisms (GRM) for the SCRP.

As per World Bank standards, the GRM operates in addition to a GBV/SEAH and Child Protection Prevention and Response Plan, which includes reporting and referral guidelines (see GBV/SEAH and Child Protection Prevention and Response Plan in the ESMF<sup>20</sup>). It also operates in addition to specific workers’ grievance redress mechanisms, which are laid out in the LMP (also part of the ESMF).

The GRM aims to address concerns in a timely and transparent manner and effectively. It is readily accessible for all project-affected parties. It does not prevent access to judicial and administrative remedies. It is designed in a culturally appropriate way and is able to respond to all needs and concerns of project-affected parties.

The GRM Value Chain is presented in Annex 2.

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<sup>18</sup> Under ESS 2 (Labour and Working Conditions), a grievance mechanism for all direct or contracted workers is prescribed. The World Bank’s Good Practice Note on ‘Addressing Gender Based Violence in Investment Project Financing involving Major Civil Works’ spells out requirements for a GBV grievance redress mechanisms, which will be defined in a separate GBV/SEA and Child Protection Risks Action Plan.

<sup>19</sup> World Bank, Environmental and Social Framework, 2018, p. 131.

<sup>20</sup> Somali Crisis Recovery Project (SCRP), Environmental and Social Management Framework, amended August 2021, accessed at: Ministry of Finance, Somalia Crisis Recovery Project, Environmental and Social Management Framework (ESMF), disclosed at: [https://www.cabri-sbo.org/uploads/files/Covid19BudgetDocuments/Somalia\\_2020\\_Planning\\_External\\_NationalPlan\\_MinPlanning\\_CEN-SADIGAD\\_English.pdf](https://www.cabri-sbo.org/uploads/files/Covid19BudgetDocuments/Somalia_2020_Planning_External_NationalPlan_MinPlanning_CEN-SADIGAD_English.pdf)

## 11. Implementation Budget

|                                                              | Required Resources                                               | Costs in USD            |
|--------------------------------------------------------------|------------------------------------------------------------------|-------------------------|
| <b>PIU – Monitoring of ESMP</b>                              |                                                                  |                         |
| 1.                                                           | Human Resources: 1 Environmental, 1 Social Safeguards Specialist | PIU staff costs         |
| 2.                                                           | 1 GBV Specialist (GBV training and GRM)                          | PIU staff costs         |
| 3.                                                           | 1 Security Specialist                                            | PIU staff costs         |
| 4.                                                           | 1 Stakeholder Consultation Specialist                            | PIU staff costs         |
| 5.                                                           | 1 GRM Specialist (GRM awareness)                                 | PIU staff costs         |
| 6.                                                           | Logistics / Travel                                               | PIU travel budget       |
| <b>Grievance Redress Mechanism hotline</b>                   |                                                                  |                         |
| 7.                                                           | Hotline and other mechanisms                                     | PIU GRM budget          |
| 8.                                                           | GBV/SEAH reporting mechanisms                                    | PIU staff costs         |
| <b>Implementation of Risk Mitigation Measures Contractor</b> |                                                                  |                         |
| 9.                                                           | Human Resources<br>1 EHS Specialist x 4 months                   | 8000                    |
| 10.                                                          | Cost of PPE                                                      | 2000                    |
| 11.                                                          | Cost of OHS and other Training                                   | 1000                    |
| 13.                                                          | Construction Waste Disposal                                      | 10000                   |
| 14.                                                          | Safety Signages                                                  | 1000                    |
| 15.                                                          | Community engagement                                             | Included in staff costs |
| 16.                                                          | Latrines                                                         | 5000                    |
| 17.                                                          | Security Costs                                                   | 6500 +tbd               |
|                                                              | <b>TOTAL</b>                                                     | <b>27 000</b>           |

Table 7 Implementation Budget

## 12. Conclusions

Belet Hawa Roads rehabilitation proposed under Component 2 of the Somalia Crisis Recovery Project (SCRCP) connects the western rural areas to the urban centers and the proposed intervention is well supported by the Government stakeholders and the local communities. The rehabilitated road is expected to deliver significant benefits to the rural communities by providing improved access to the urban centers for social services, access to livelihood opportunities and economic gains. The improved roads would lead to savings in travel time and vehicle maintenance costs that could benefit the rural population. The primary beneficiaries are the rural populations.

The activities associated with the rehabilitation of the Belet Hawa Roads are also likely to generate site-specific risks and adverse impacts. Most of these are related to typical risks and impacts associated with the civil works, for example, risks related to disposal and management of material generated from construction activities, occupational health and safety of workers both during the construction and operational phases, increased level of dust, noise and vibration from moving of construction vehicles and machinery, community health and safety risk, risks associated with labor engagements, e.g. child labor or forced labor, labor influx and associated risks such as GBV/SEAH, and others.<sup>21</sup> There are further some temporary street vendors that have partially encroached on the Right of way (RoW), who will need to be moved away. This will result in PAPs losing their livelihoods. A RAP has been prepared for this matter.

The ESMP was prepared to help mitigate potential environmental and social risks and impacts. The risks and impacts for the Belet Hawa Roads were classified as moderate, mostly consisting of typical civil works related risks and impacts. The ESMP will assist the PIU, SPT and the Contractor on environmental and social risk mitigation measures to be implemented throughout the works to ensure compliance with all SCRCP E&S instruments, World Bank Environmental and Social Standards (ESSs) and local legislation.

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<sup>21</sup> <https://thedocs.worldbank.org/en/doc/648681570135612401-0290022019/original/GoodPracticeNoteRoadSafety.pdf>

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## Annex 1: Community Consultations

### Locations reached through community engagements (roads)

| Districts  | Consulted Members/ Groups<br>(Local administration and communities)                       | #<br>Community<br>reached | Gender |    | # of<br>engagements<br>held.   | Who/ Team     |
|------------|-------------------------------------------------------------------------------------------|---------------------------|--------|----|--------------------------------|---------------|
|            |                                                                                           |                           | M      | F  |                                |               |
| Belet-hawa | Local Authority, DC, IDPS, Women groups, religious and clan elders and Community members. | 61                        | 38     | 23 | During the initial assessments | PIU and UNOPS |

| Date             | District   | List all engagements the team on the C2 road rehabilitation. | Actual Participants met and community meetings. interviewed                                                                                                                                                                                                                                                                                                                                                                    | Community feedback                                                                                                                                                                                                                                                                             |
|------------------|------------|--------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 25th of February | Belet Hawa | 1 - Community engagement meetings.                           | This meeting was attended by the District Commissioner Abdirashid Abdi, Humanitarian/Projects coordinator Mohamed Farah Abdi, Secretary of Social Affairs Nor Adawe, Mayor of Belet Hawa Ali Geedi Barre, Auditor General Abdihakim Omar Barre, Commissioner of youth & sports Abdiwahid Hussein Osman and one member of the youth and sports group Abdifatah Abdullahi Omar. As well IDPS represented and women associations. | Key priority was Rehabilitation of roads and other infrastructure<br><br>After discussion and consultation with Belet Hawo administration as well as community elders in the district, the following were main prioritizations that has been identified:<br>Detail sees the List participants. |

### 1- Belethawo – Beneficiaries



**The Federal Government of Somali**  
**Ministry of Finance**  
**Somalia Crises Recovery Project (SCRCP)**

Date: 25/02/2021

Subject: Attendance Sheet Field Mission Belet Hawa

| No | Name                   | Title                        | Telephone  |
|----|------------------------|------------------------------|------------|
| 1  | Muhammed Faarax Abili  | humanitarian coordinator     | 0615020284 |
| 2  | Abdirashid Hassan Abdi | Gudoomiyaha degmada          | 0614876554 |
| 3  | Nor Casame Beled       | Xoghayaha Aqalka Bulaale     | 0614221150 |
| 4  | Adifateh Abdilahi omar | ururka dhislayrada           | 0616222246 |
| 5  | daali muhamed qoole    | ururka dhalayrada            | 0615388680 |
| 6  | cismon cali            | M o m u l c o.               | 0615876931 |
| 7  | cali kadi              | M o m u l c o.               | 0615852159 |
| 8  | c/xakari omar Barre    | Hantiidhawraha D-G           | 0612188223 |
| 9  | chiraxid xuseen cismon | Gudamiyaha dhalayrada        | 0615568878 |
| 10 | Iftin Guun osma        | Director MCH                 | 0617848061 |
| 11 | Chweli Cali Gaas       | Supervisor                   | 0615259508 |
| 12 | Iftin Cade nuran       | Gudoomiyaha                  | 061983884  |
| 13 | Omar Dahir             | Gudamiyaha                   | 0615548722 |
| 14 | Xasan Cabdi Cali omar  | Gudamiye K/xigeen.           | 0615895332 |
| 15 | faarax adan nuur dahi  | Village Elder                | 0616367716 |
| 16 | Maxamed Xasan Adan     | Agasimaha Xafiska Gudamiyaha | 0613426789 |
| 17 | Jobir Maxamed Cheli    | Saxafi                       | 0616863199 |
| 18 | C/laahi Maxamed Nuux   | Xog-hayaha Xafiska Gud.      | 0618748638 |

|    |                                  |                       |             |
|----|----------------------------------|-----------------------|-------------|
| 20 | Idric Aden Nuur                  | oday-dhagameed        | 0615557667  |
| 21 | Maxamed Cali Xasan               | Godoomiye Tuulo       | 0617848248  |
| 22 | Cabali Yuusuf Qase               | Tuulada Qurac-Bilqash | 0616498894  |
| 23 | Cabali Cali Almi                 | Tuulada Qurac-Bilqash | -0616861047 |
| 24 | Yuusuf Samaan Xasan              | Tuulada Qurac-Bilqash | -0615646909 |
| 25 | Aden Ibrahim <del>Maxamed</del>  | Bulshada Rayidka      | -0617531608 |
| 26 | Xasan Maxamed Aye                | Xagfada Zansax-omane  | 0615246263  |
| 27 | Iftin Cabali Maxamed             | Tuulada Qurac-Bilqash | -0615487055 |
| 29 | Maxamed Yuusuf Xuseen            | Tuulada libclay       | 0616533376  |
| 30 | Xasan Ibrahim Dhagameed          | Xagfada golay-hayd    | 0618928479  |
| 31 | Dirye Salad Xuseen               | Tuulada -Wariiryaale  | 0618825072  |
| 32 | C. nassir Cilashi Xasan          | Xagfada todobaad      | 0616367932  |
| 33 | Maxamed Cabali Dirye             | Bulshada Rayidka      | 0617137393  |
| 34 | Axmed <del>Maxamed</del> Muxamed | Tuulada Qurac-Bilqash | 0615895465  |
| 35 | Maxamed Cilashi Muxamed          | Xagfada Qadhaaw       | 0618530951  |
| 36 | C. wali Xuseen Aden              | ganaacsade            | 0615810713  |
| 37 | Cigadiir Shire Maxamed           | Xagfada Qadhaaw       | 0618389559  |
| 38 | Xiish Zaliif Wayax               | Xagfada Qadhaaw       | 0615610693  |
| 39 | Axmed Aden Muxamed               | Xagfada Qadhaaw       | 0615159052  |
| 40 | Xuseen Maxamed Muxamed           | Xagfada Zansax        | 0615558351  |
| 41 | C. Fitax Maxamed Dirye           | Xagfada Qadhaaw       | 0618412990  |
| 42 | Bashar Ali Maxamed               | odayqashu degmada     | 0616158823  |

|    |                          |                       |                   |
|----|--------------------------|-----------------------|-------------------|
| 43 | C. nuur Almi Cali        | oday-dhagameed        | tell: 0615123155  |
| 44 | Ibrahim Farax Cilashi    | oday-dhagameed        | tell: 0615735852  |
| 45 | Nuur Faarax Cali         | oday-dhagameed        | tell: 0615603549  |
| 46 | Dhoofoow Cabow Nuur      | oday-dhagameed        | tell: 0615219970  |
| 47 | Cabali Aden Xasan        | oday-dhagameed        | tell: 0615554850  |
| 48 | Maxamed Bule Cabali      | oday-dhagameed        | tell: 0615569731  |
| 49 | Cigadiir Maxamed Muxamed | oday-dhagameed        | tell: 0615569521  |
| 50 | Cilashi Xuseen Maxamed   | dhagameed             | tell: 06153609965 |
| 51 | C. Waxid Xuseen Cilman   | Godoomiyaha Dhagameed | tell: 0615568878  |
| 52 | Amin Xasan Cigadiir      | B-Xagfada             | tell: 0616217810  |
| 53 | Shugri Axmed Samur       | dhagameed             | tell: 0616834422  |
| 54 | Amin Farax Bile          | dhagameed             | tell: 0615823324  |
| 55 | Xaybo Ismaaciil Cabalibo | Xobin ururka Haweenka | tell: 0615810132  |
| 56 | Xaybo Maxamed Samatar    | Xobin ururka Haweenka | tell: 0615388594  |
| 57 | Filis Cabali Diirsho     | Xobin ururka Haweenka | tell: 0615810240  |
| 58 | Saxiib Cali Bire         | Xobin ururka Haweenka | tell: 0618211728  |
| 59 | Xaybo Aden Salad         | Xobin ururka Haweenka | tell: 0618894196  |
| 60 | Xaybo Cilashi Maxamed    | Xobin ururka Haweenka | tell: 0615810746  |



*Figure 13 Belet Hawa Community Consultations February 2021*

## Annex 2: Grievance Redress Mechanisms

This annex describes the Project GRM's objectives and the steps of the GRM Value Chain in more detail.

### GRM Objectives

The key objective of the GRM is to establish a prompt, easy to understand, consistent and respectful mechanism to support the receiving, investigating and responding to complaints or grievances from project stakeholders. It is designed to offer project stakeholders an opportunity to seek and receive grievance redress; to strengthen the project's team ability to identify, track, resolve and refer eligible grievances; and to enhance the Project's development results and outcomes. The GRM is expected to contribute to continuous improvement in performance of the SCRP through an analysis of trends and lessons learned. The GRM does not prevent access to judicial and administrative remedies. It is designed in a culturally appropriate way and is able to respond to all needs and concerns of project-affected parties.

The SCRP has contracted a GRM Focal Point, Halima Farah. It further has put in place a hotline with the number '337'.

*Table 8 Types of Complaints expected*

| <b>Categories of Grievances</b>                                                                                                                                                           |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>1. Basic information</b>                                                                                                                                                               |
| - Access to information                                                                                                                                                                   |
| - Correction and deletion of untrue or misleading information that affects the person                                                                                                     |
| <b>2. Ethics and conduct</b>                                                                                                                                                              |
| - Government entities and staff                                                                                                                                                           |
| - Implementing Partner staff                                                                                                                                                              |
| <b>4. Violation and breach of codes of ethics</b>                                                                                                                                         |
| - Violation of codes of ethics;                                                                                                                                                           |
| - Breach of the code of ethics by government officers:                                                                                                                                    |
| - Breach of Code of Conduct and Ethics by staff of Implementing Partners                                                                                                                  |
| <b>5. Violation of human rights and fundamental freedoms</b>                                                                                                                              |
| - Gender equality and general equality matters.                                                                                                                                           |
| - Equality and freedom from discrimination (Equality -every person; Equality of men and women to opportunities in political, economic, cultural and social)                               |
| - Economic and Social Rights (health, sanitation, freedom from hunger, adequate and quality food, clean safe and adequate water, social security, education, emergency medical treatment) |
| - Non-discrimination of special needs groups                                                                                                                                              |
| <b>6. Corruption and Economic crimes</b>                                                                                                                                                  |
| - Unethical conduct                                                                                                                                                                       |
| <b>7. Labor and working conditions</b>                                                                                                                                                    |
| - Termination/Summary Dismissal,                                                                                                                                                          |
| - Breach of Employment Contract Terms                                                                                                                                                     |
| - Conflicts with Trade Unions                                                                                                                                                             |

|                                                                                                                                                                                                  |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| - <b>Work Injury</b>                                                                                                                                                                             |
| - <b>Discrimination</b>                                                                                                                                                                          |
| - <b>Sexual Harassment</b>                                                                                                                                                                       |
| - <b>Remuneration</b>                                                                                                                                                                            |
| - <b>Wrongful termination</b>                                                                                                                                                                    |
| - <b>Suspension</b>                                                                                                                                                                              |
| - <b>Waiver of Claims</b>                                                                                                                                                                        |
| <b>8. Environmental compliance violations</b>                                                                                                                                                    |
| - <b>Violation of environmental standards laid out in the ESIA's, ESMPs, and ESMF</b> including noise, vibration, dust, pollution, waste accumulation, debris, wastewater, damages to ecosystem. |
| <b>9. Occupational Health and Safety (OHS)</b>                                                                                                                                                   |
| - <b>Violation of occupational health and safety measures and standards laid out in the ESMF, ESMPs</b>                                                                                          |
| - <b>Violations of community health and safety through public works</b>                                                                                                                          |
| <b>11. Gender-Based Violence (GBV) / Sexual Exploitation and Abuse (SEA) / Sexual Harassment (SH)</b>                                                                                            |
| - <b>Gender based violence committed by project personnel or any worker on the Project, or GBV committed in relation to the Project</b>                                                          |
| - <b>Sexual Exploitation and Abuse committed by Project staff or any worker of an IP associated to the Project</b>                                                                               |
| - <b>Sexual Harassment committed by Project staff or any worker of an IP associated to the Project</b>                                                                                           |

## Available Channels

A phone number for a hotline operator: The phone number of a grievance hotline operator must be widely disseminated among project stakeholders. The Hotline Operator is available from 8.00 am to 5.00 pm every day through a toll-free number. The hotline operator is set up and managed by the Project Implementation Unit (PIU). Any concerned party can call the hotline number and file a grievance with the Project. Hotline Operators will respond in Somali or English.

A help desk must be set up by the respective IP during the implementation of sub-project activities in an area.<sup>22</sup> They should be manned by the IP staff, especially its community project facilitators, in close coordination with local authorities. At the help desk, PAPs can inquire about information in regard to project activities, or they can file a grievance directly with the person manning the desk. Grievances can be filed in writing or verbally at the Help Desk.

Relevant assigned personnel available in each project site will be required to accept formal grievances and ensure that avenues for lodging grievances are accessible to the public and all PAPs. The first point of contact for all potential grievances from community members may be the contractor, IP or the local government official. Such personnel will be required to accept formal grievances; or they can point out the Hotline Operator's number, the Help Desk or Suggestion Box.

<sup>22</sup> The help desk must be budgeted by the IP, the manning of the help desk will depend on the nature of the activity

A suggestion box must be installed at the nearest local administration office of the sub-project site. Suggestion boxes provide a more anonymous way of filing a grievance or for providing feedback. Grievances or feedback submitted to the Suggestion Box must be expressed in writing. Suggestion Boxes are installed at the closest official administration office in the sub project area. Boxes are clearly marked as SCRP-related feedback and grievance mechanism.

## **Processing Steps**

### **Step 1: Grievance Uptake**

Multiple channels must be available for aggrieved parties to file their complaint, grievance, or feedback. The aggrieved party must be able to select the most efficient institution, the most accessible means of filing a grievance, and must be able to circumvent partial stakeholders in the Project, which may be implicated in the complaint. He or she must further be able to bypass some grievance channels that are perceived as potentially not responsive or biased.

GBV/SEA/SH-related Grievance: Given the sensitive nature of GBV complaints, the GRM provides different ways to submit grievances. All grievance uptake channels can be used to report on GBV/SEA/SH-related grievances. No grievance uptake mechanism cannot reject such grievances, and all personnel directly receiving grievances will be trained in the handling and processing of GBV/SEA/SH-related grievances. Information on relevant legislation will be delivered to survivors prior to any disclosure of case details, for example through initial awareness raising sessions on the GRM. This will allow protect the survivor-centered approach from mandatory reporting.

### **Step 2: Sort and Process**

All registered grievances will be transferred to the GRM Focal Point at the respective IP at state or national level – either by the Hotline Operator, local personnel, or the Help Desk Officer. The GRM focal point will categorize the complaint according the table above (section on ‘Categorization of Grievance’). Worker-related grievances will be handed over to a workers’ GRM (see below). Where grievances are of sexual nature and can be categorized as GBV/SEAH or child protection risk, the IP has to handle the case appropriately, and refer the case to the GBV reporting protocols and referral system, defined in the GBV/SEAH and Child Protection Prevention and Response Plan. Dedicated training on how to respond to and manage complaints related to GBV/SEAH will be required for all GRM operators and relevant project staff (see below).

For grievances handled under the general Project GRM, the GRM Focal Point will determine the most competent and effective level for redress and the most effective grievance redress approach. The focal point will further assign timelines for follow-up steps based on the priority of the grievance, and make a judgment and reassign the grievance to the appropriate staff or institution. The person will exclude grievances that are handled elsewhere (e.g. at the court). The focal point should offer the complainant option/s for resolution of their grievance.

GBV/SEA/SH: All reporting will limit information in accordance with the survivor's wishes regarding confidentiality and in case the survivor agrees on further reporting, information will be shared only on a need-to-know-base, avoiding all information which may lead to the identification of the survivor and any potential risk of retribution.

Data on GBV cases recorded will only include the nature of the complaint (what the complainant says in her/his own words), whether the complainant believes the perpetrator was related to the project and additional demographic data, such as age and gender, will be collected and reported, with informed consent from the survivor. If the survivor does not wish to file a formal complaint, referral to available services will still be offered even if the complaint is not related to the project, that referrals will be made, the preference of the survivor will be recorded and the case will be considered closed.

### **Step 3: Acknowledgement and Follow-Up**

The respective IP will decide whether a grievance can be solved locally, with local authorities, implementers, NGOs, CSOs or contractors, and whether an investigation is required. The first ports of call will have in-depth knowledge of communal socio- political structures and will therefore be able to recommend to the GRM Focal Point the appropriate individuals that could be addressed with the case, if the case can be solved at the local level.

### **Step 4: Verify, Investigate and Act**

The IP, the GRM Focal Point, will then undertake activity-related steps in a timely manner. The activities will include: verifying, investigating, redress action and plan.

*Table 9 GRM Actions*

| Grievance Category                                                                              | Required Action                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|-------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Queries, comments and suggestions                                                               | Acknowledgement / Clarification                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| Complaints and concerns which do not require formal investigation                               | <p>Grievances should be handled and resolved by the immediate manager within the GRM structure, e.g. the GRM Focal Point or a dedicated staff.</p> <p>The IP should appoint a grievance redress committee, which includes relevant staff in the IP organization and can include a selected local authority (ideally the committee consists of an equal number of men and women), which can hear both parties and ideally solve the matter within the organization.</p>                                                                                        |
| Complaints and concerns that involve allegations that require investigation or interventions of | <p>As appropriate, conduct verification, negotiation, mediation or arbitration, coordination with respective authorities, decision-making, escalation to judicial or administrative institutions, proposed solutions, implementation of agreed actions, etc...</p> <p>The IP should appoint a grievance redress committee, which includes relevant staff in the IP organization and can include a selected local authority (ideally the committee consists of an equal number of men and women), which can hear both parties and ideally solve the matter</p> |

|                  |                          |
|------------------|--------------------------|
| a different kind | within the organization. |
|------------------|--------------------------|

### Step 5: Monitor, Evaluate and Provide Feedback

The IP/GRM Focal Point will provide feedback to GRM users and the public at large about:

- results of investigations;
- actions taken;
- why GRM is important;
- enhance the visibility of the GRM among beneficiaries; and
- increase in users' trust in the GRM

### Response Times

*Table 10 GRM Response Times*

| Type of Case                                                      | Actions Required                                                                                                                                                                                                                                       | Response Required                                                                                                                                                                                                                  |
|-------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Straight-forward cases with little anticipated complications      | minimal checks and consultations                                                                                                                                                                                                                       | Acknowledge reception of the grievance, detail follow-up steps and set timelines (number of days) for follow-up activities: verify, investigate, if need be, and communicate outcomes and next steps based on outcomes<br>1-3 days |
| Cases that require some minimal processes                         | delete misleading information, collect information, analyze existing information, prepare communication materials to disclose delayed information, clarify existing information, and correct misleading information                                    | Acknowledge reception of the grievance, detail the steps to follow, and provide the appropriate practical timelines<br>7 -14 days                                                                                                  |
| Cases that requires investigation                                 | access and review of relevant documentation (reports, policy documentation), field-based fact findings missions (visits and interviews), analysis and preparation of reports, consultative sessions to rectify or adjust the implementation approaches | Acknowledge reception of the grievance, provide follow-up steps and set timelines for a comprehensive response<br>14 to 21 days                                                                                                    |
| Cases that require escalation to higher SCRP implementation level | Transfer case to relevant higher level (e.g. state-level or national HQ of IP; PIU)                                                                                                                                                                    | Acknowledge reception of the grievance, provide the need for escalation of the grievance to the next project implementation level, and set timelines for a comprehensive response<br>7-14 days                                     |
| Cases that require referral to other institutions                 | Transfer case to relevant institution (National Police Service, World Bank)                                                                                                                                                                            | Acknowledge reception of the grievance, provide the need for referral of the grievance to an appropriate institution, and set timelines for a comprehensive response on referral progress<br>7 - 21days                            |

## **Other Redressal options**

Communities and individuals who believe that they are adversely affected by a World Bank supported project may submit complaints to existing project-level grievance redress mechanisms or the WB's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>.

### Annex 3: Environmental and Social Monitoring Template

This annex presents a template that should be used for the E&S monitoring process by the SPT/PIU monitoring team. This template will be based on the EMSP Table above (Table 4), it will list all the above mentioned risks and impacts, mitigation measures, indicators, responsibilities, monitoring frequency as per the table above. Prior to the commencement of the works, targets will be added to the indicators, after consultation with the contractors. The findings and observation column will be filled in upon reviews, supervision and inspection as well as based on reporting by the contractors. The corrective action column will be filled in when non-compliances have been discovered, and corrective actions have been agreed on jointly with the contractor.

*Table Environmental Monitoring Plan*

| Risks and Impacts | Mitigation Measures | Indicators | Responsibility | Monitoring Frequency | Findings/Observations | Corrective Action |
|-------------------|---------------------|------------|----------------|----------------------|-----------------------|-------------------|
|                   |                     |            |                |                      |                       |                   |
|                   |                     |            |                |                      |                       |                   |
|                   |                     |            |                |                      |                       |                   |

## **Annex 4: Code of Conduct for Workers**

**International Labor Conventions and Recommendations:** The International Labor Standards (i.e., Conventions and Recommendations) have served as the foundation on which much of this Code of Conduct is based.

### **1. Scope of Application:**

It is expected that these principles apply to contractors, suppliers and their employees, parent, subsidiary or affiliate entities and subcontractors. It is expected that contractors ensure that this Code of Conduct is communicated to their employees, parent, subsidiary and affiliated entities as well as any subcontractors, and that it is done in the local language and in a manner that is understood by all. This Code of Conduct provides the minimum standards expected. In addition, contractors should note that certain provisions of this Code of Conduct will be binding in the event the contractor is awarded a contract by the Project pursuant to the terms and conditions of any such contract. Failure to comply with certain provisions may also preclude contractors from being eligible for a contract award.

### **2. Continuous Improvement:**

The provisions as set forth in this Code of Conduct provide the minimum standards expected of contractors. It is expected that contractors strive to exceed both international and industry best practices. It is also expected that contractors encourage and work with their own suppliers and subcontractors to ensure that they also strive to meet the principles of this Code of Conduct. It is recognized that reaching some of the standards established in this Code of Conduct is a dynamic rather than static process and encourages suppliers to continually improve their workplace conditions accordingly.

### **3. Management, Monitoring and Evaluation:**

It is the expectation that contractors, at a minimum, have established clear goals toward meeting the standards set forth in this Code of Conduct. It is expected that contractors will establish and maintain appropriate management systems related to the content of this Code of Conduct, and that they actively review, monitor and modify their management processes and business operations to ensure they align with the principles set forth in this Code of Conduct. Contractors participants in the Global Compact are strongly encouraged to operationalize its principles and to communicate their progress annually to stakeholders.

### **Labor:**

**4. Freedom of Association and Collective Bargaining:** It is expected that contractors recognize the freely-exercised right of workers, without distinction, to organize, further and defend their interests and to bargain collectively, as well as to protect those workers from any action or other form of discrimination related to the exercise of their right to organize, to carry out trade union activities and to bargain collectively.

**5. Forced or Compulsory Labor:** It is expected that contractors prohibit forced or compulsory

labor in all its forms.

**6. Child Labor:** It is expected that contractors do not employ: (a) children below 18 years of age or, if higher than that age, the minimum age of employment permitted by the law of the country or countries where the performance, in whole or in part, of a contract takes place, or the age of the end of compulsory schooling in that country or countries, whichever is higher; and (b) persons under the age of 18 for work that, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of such persons.

**7. Discrimination:** It is expected that contractors ensure equality of opportunity and treatment in respect to employment and occupation without discrimination on grounds of race, colour, sex, religion, political opinion, national extraction or social origin and such other ground as may be recognized under the national law of the country or countries where the performance, in whole or in part, of a contract takes place. It is expected that contractors take all appropriate measures to ensure that neither themselves nor their parent, subsidiary, affiliate entities or their subcontractors are engaged in any gender-based or other discriminatory employment practices, including those relating to recruitment, promotion, training, remuneration and benefits.

**8. Wages, Working Hours and Other Conditions of Work:** It is expected that contractors ensure the payment of wages in legal tender, at regular intervals no longer than one month, in full and directly to the workers concerned. Suppliers should keep an appropriate record of such payments. Deductions from wages are permitted only under conditions and to the extent prescribed by the applicable law, regulations or collective agreement and suppliers should inform the workers concerned of such deductions at the time of each payment. The wages, hours of work and other conditions of work provided by suppliers should be not less favorable than the best conditions prevailing locally (e.g. collective agreements covering a substantial proportion of employers and workers / arbitration awards / applicable laws or regulations) for work of the same character performed in the trade or industry concerned in the area where work is carried out.

**9. Health and Safety:** It is expected that contractors ensure, so far as is reasonably practicable, that: (a) the workplaces, machinery, equipment and processes under their control are safe and without risk to health; (b) the chemical, physical and biological substances and agents under their control are without risk to health when the appropriate measures of protection are taken; and (c) where necessary, adequate protective clothing and protective equipment are provided to prevent, so far as is reasonably practicable, risk of accidents or of adverse effects to health.

#### **Human Rights:**

**10. Human Rights:** It is expected that contractors support and respect the protection of internationally proclaimed human rights and to ensure that they are not complicit in human rights abuses.

**11. Harassment, Harsh or Inhumane Treatment:** It is expected that contractors create and maintain an environment that treats all employees with dignity and respect. It is further expected that contractors, as well as their parent, subsidiary and affiliated entities along with any subcontractors, will neither use or engage in, nor allow their employees or other persons engaged by them to use or engage in, any: threats of violence, verbal or psychological harassment or abuse, and/or sexual exploitation and abuse. Sexual exploitation and abuse violate universally recognized international legal norms and standards and are unacceptable behavior and prohibited conduct. Prior to entering into agreements, contractors are informed of the standards of conduct with respect to the prohibition of sexual exploitation and abuse, expected. Such standards include, but are not limited to, the prohibition of: (i) engaging in any sexual activity with any person under the age of 18, regardless of any laws of majority or consent, (ii) exchanging any money, employment, goods, services, or other things of value, for sex, and/or (iii) engaging in any sexual activity that is exploitive or degrading to any person. It is expected that contractors take all appropriate measures to prohibit their employees or other persons engaged by the suppliers, from engaging in sexual exploitation and abuse. It is also expected that contractors create and maintain an environment that prevents sexual exploitation and abuse. Contracts will contain provisions concerning a supplier's obligation to take appropriate measures to prevent sexual exploitation and abuse. The failure by a supplier to take preventive measures against sexual exploitation or abuse, to investigate allegations thereof, or to take corrective action when sexual exploitation or abuse has occurred, constitute grounds for termination of any agreement. Moreover, no harsh or inhumane treatment coercion or corporal punishment of any kind is tolerated, nor is there to be the threat of any such treatment.

**12. Mines:** It is expected that contractors do not to engage in the sale or manufacture of anti-personnel mines or components utilized in the manufacture of anti-personnel mines.

#### **Environment:**

**13. Environmental:** It is expected that contractors have an effective environmental policy and to comply with existing legislation and regulations regarding the protection of the environment. Suppliers should wherever possible support a precautionary approach to environmental matters, undertake initiatives to promote greater environmental responsibility and encourage the diffusion of environmentally friendly technologies implementing sound life-cycle practices.

**14. Chemical and Hazardous Materials:** Chemical and other materials posing a hazard if released into the environment are to be identified and managed to ensure their safe handling, movement, storage, recycling or reuse and disposal.

**15. Wastewater and Solid Waste:** Wastewater and solid waste generated from operations, industrial processes and sanitation facilities are to be monitored, controlled and treated as required prior to discharge or disposal.

**16. Air Emissions:** Air emissions of volatile organic chemicals, aerosols, corrosives, particulates,

ozone depleting chemicals and combustion by-products generated from operations are to be characterized, monitored, controlled and treated as required prior to discharge or disposal.

**17. Minimize Waste, Maximize Recycling:** Waste of all types, including water and energy, are to be reduced or eliminated at the source or by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.

**Ethical conduct:**

**18. Corruption:** It is expected that contractors adhere to the highest standards of moral and ethical conduct, to respect local laws and not engage in any form of corrupt practices, including but not limited to extortion, fraud or bribery.

**19. Conflict of Interest:** It is expected that contractors disclose any situation that may appear as a conflict of interest, and disclose if any official or professional under contract may have an interest of any kind in the supplier's business or any kind of economic ties with the supplier.

**20. Gifts and Hospitality:** No invitations to sporting or cultural events should be accepted, offers of holidays or other recreational trips, transportation, or invitations to lunches or dinners. It is expected that contractors do not offer any benefit such as free goods or services, employment or sales opportunity to staff members in order to facilitate the contractors' business with the Project entities.

**21. Post-employment restrictions:** Post-employment restrictions may apply to staff in service and former staff members who participated in the procurement process, if such persons had prior professional dealings with suppliers. Contractors are expected to refrain from offering employment to any such person for a period of one year following separation from service.

## **Annex 5: Chance Find Procedures**

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 included as a standard provision in the implementation of SCRP Public 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.

Excavation in sites of known archaeological interest should be avoided. Where this is unavoidable, prior discussions must be held with the PIU 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 responsible authority takes over;
- Notify the responsible foreman/archaeologist, who in turn should notify the PIU 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 finding 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, PIU and World Bank after the decision concerning the safeguard of the heritage is fully executed;
- 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.