
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, Dhul alle Road, Dolow Road, and Boiya Road
Gedo Region, Jubaland State**

04 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
EHSGs	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 three roads in Luuq Town in Gedo Region, Jubaland State: Dhul alle Road (3.5 km); Dolow Road (0.9 km); and Boiya Road (4.0 km). The works include the construction and maintenance of diversion roads, reconstruction of the existing roads, construction of road side drains and drainage structures, as well as general construction work.

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 Luuq Road in Gedo Region. 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 SCRPP ESMF¹. 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.

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.

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 will be available for complaints raised by impacted communities and will stay functional throughout the operation, and reiterates stakeholder consultations that have been conducted in the lead up to the project design.

¹ 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

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 (SCRP) 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 SCR. 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 parts of Luuq 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 Luuq Roads have 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&S² screening of the sub-project, as per process described in the SCRP ESMF³. 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 Luuq 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 (EHSsGs).

² 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 labor aspects.

³ 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_CE N-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 1972⁴ (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 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.

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

In regards to occupational health and safety standards (OHS) (Art. 101), 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.

United Nations Convention to Combat Desertification (2002). The Convention combats desertification in those countries that experience serious droughts and/or desertification. Somalia ratified the Convention in 2002, and its 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-project⁵:

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 and

⁵ 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.

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.⁶ 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. There are no impacts expected in regards to this road project.

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

⁶ SCRP, Environmental and Social Management Framework, amended August 2021.

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 subproject, as listed below. In consideration of Covid-19 restrictions, the project has followed World Bank guidelines on community consultation under COVID-19.

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

The subproject will apply the WBG General EHS Guidelines from 2007, including 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.

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
ESS 1: Assessment and Management of Environmental and Social Risks and Impacts			
Objectives of ESS 1 are: To identify, evaluate and manage the environment and social risks and impacts of the project in a manner consistent with the ESSs. To adopt a mitigation hierarchy approach to: (a) Anticipate and avoid risks and impacts; (b) Where avoidance is not possible, minimize or reduce risks and impacts to acceptable levels; (c) Once risks and impacts have been minimized or reduced, mitigated; and (d) Where significant residual impacts remain, compensate for or offset them, where technically and financially feasible. 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.	<u>Provisional Constitution of the Federal Republic of Somalia.</u> Article 12 of the Constitution addresses public assets and natural resources. Article 43 provides guidelines on environmental and social safeguards that can be observed.	Laws have not been developed yet ESIAs not incorporated in federal law yet, and not strong in State-level legislation	An E&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.

ESF Objectives	National Laws and Requirements	Gaps	Recommended Actions
To utilize national environmental and social institutions, systems, laws, regulations and procedures in the assessment, development and implementation of projects, whenever appropriate. To promote improved environmental and social performance, in ways which recognize and enhance Borrower capacity.			
ESS 2: Labor and Working Conditions			
The Objectives of ESS 2 are: To promote safety and health at work. To promote the fair treatment, non-discrimination and equal opportunity of project workers. 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. To prevent the use of all forms of forced labor and child labor. To support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law. To provide project workers with accessible means to raise workplace concerns.	<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. 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 . <u>The Labour Code of 1972</u> stipulates that all contracts of employment must include a) the nature and duration of the	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 n/a	The subproject 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 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. The subproject will fully comply with WB ESS 2. This is set out in the LMP.

ESF Objectives	National Laws and Requirements	Gaps	Recommended Actions
	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.		
	<u>The Labour Code of 1972.</u> 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	n/a	The subproject will apply OHS management system that is consistent with the WBG General EHSs on OHS.
	<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	Women are restricted from being employed in night work, and the specific types of work prohibited for women may be prescribed by decree. No provisions on the protection of the rights of domestic workers	The subproject will fully comply with the national law and WB ESS 2. This is set out in the LMP and this ESMP.

ESF Objectives	National Laws and Requirements	Gaps	Recommended Actions
	hours per week are 8 hours per day and 6 days per week.		
	<u>The Labour Code of 1972.</u> 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.	n/a	The Project will only allow deployment from the age of 18 (see LMP).
	<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.	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) However, Somalia made efforts to construct a rehabilitation center for former child combatants and establish a Human Trafficking and Smuggling Task Force. 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 of children by army);	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.

ESF Objectives	National Laws and Requirements	Gaps	Recommended Actions
		children also perform dangerous tasks in street work Laws do not identify hazardous occupations or activities prohibited for children, and child trafficking for labor and commercial sexual exploitation is not criminally prohibited.	
	The Labour Code of 1972. 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.	n/a	The project will follow national law and ESS 2.
ESS 3: Resource Efficiency and Pollution Prevention and Management			
The Objectives of ESS 3 are: To promote the sustainable use of resources, including energy, water and raw materials. To avoid or minimize adverse impacts on human health and the environment by avoiding or minimizing pollution from project activities. To avoid or minimize project-related emissions of short and long-lived climate pollutants. To avoid or minimize generation of hazardous and non-hazardous waste.	<u>Provisional Constitution of the Federal Republic of Somalia.</u> Somalia passed its Provisional Constitution in 2012. Article 12 of the Constitution addresses public assets and natural resources. <u>Provisional Constitution of the Federal Republic of Somalia.</u> Article 25 of the Constitution states that every Somali has the	Laws in support of the Constitution are still not available. Implementation of the laws and Constitution may be hampered due to the weak justice system	The Project will promote the sustainable use of resources and avoid or minimize adverse impacts on human health according to the Constitution and the WB's ESS3. Detailed measures are laid out in this ESMP

ESF Objectives	National Laws and Requirements	Gaps	Recommended Actions
	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. <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. 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. Article 45: The FGS and the governments of the FMS affected by environmental damage shall take urgent		

ESF Objectives	National Laws and Requirements	Gaps	Recommended Actions
	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.		
ESS 4: Community Health and Safety			
The Objectives of ESS 4 are: 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. To avoid or minimize community exposure to project-related traffic and road safety risks, diseases and hazardous materials. To have in place effective measures to address emergency events. 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. To promote quality and safety, and considerations	<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. 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	The Somali Penal Code of 1962 fails to protect survivors and prosecute perpetrators The crimes under Articles 398-9 are too narrowly defined to satisfy international law standards of protection from sexual and gender based violence	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.

ESF Objectives	National Laws and Requirements	Gaps	Recommended Actions
relating to climate change, in the design and construction of infrastructure, including dams	commission of an offence both the perpetrator and his superior will be liable		
	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.
ESS 5: Involuntary Resettlement			
The Objectives of ESS 5 are: To avoid involuntary resettlement or, when unavoidable, minimize involuntary resettlement by exploring project design alternatives. To avoid forced eviction. To mitigate unavoidable adverse social and economic impacts from land acquisition or restrictions on land use by providing timely compensation for loss of assets at replacement	<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. 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. Compensation is provided only for occupants of temporary	There is a lack of detailed legislation governing land use and ownership Evictions are reported to be commonplace in Somalia 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)	Where land is donated by private owners, a land donation agreement process is implemented. No ESS 5 impacts are expected, based on the E&S screening of the sub-project

ESF Objectives	National Laws and Requirements	Gaps	Recommended Actions
	structures. Affected persons are to be settled in suitable land and their eviction and settlement costs be paid for by the local government. Provisional Constitutions of Somalia (Article 43) call for consultation between the Mayor and the Planning Committee prior to the expropriation of private land The Agricultural Land Law (1975). 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.	2. Those who do not have formal legal rights to land at the time of census, but have a claim that is recognized under the laws of the country 3. Those who have no recognizable legal right or claim to the land they are occupying. Those without legal title to land, including squatters and encroachers, are eligible for only limited protection under Somali laws and policies 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 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. Somali law does not determine compensation schedule and cut-off date.	

ESF Objectives	National Laws and Requirements	Gaps	Recommended Actions
		ESS 5 determines that improvements of the living situations of displaced vulnerable people should be undertaken, Somali Law does not provide for that. 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 The Agricultural Land Law led to disparities between statutory tenure and actual land use and allocation.	
ESS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources			
The Objectives of ESS 6 are: To protect and conserve biodiversity and habitats. To apply the mitigation hierarchy and the precautionary approach in the design and implementation of projects that could have an impact on biodiversity. To promote the sustainable management of living natural resources. To support livelihoods of local communities, including	<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. Every Somali has a right to have a share of the natural resources of the country, whilst being protected from excessive and damaging	No detailed laws govern biodiversity conservation and sustainable management of living natural resources at this point. The law is outdated, inadequate and unenforceable. It lacks conservation modalities for fish stock and marine mammals. A new draft bill has not been passed in parliament	The subproject will not encroach into any modified, natural, critical habitat and/or protected areas

ESF Objectives	National Laws and Requirements	Gaps	Recommended Actions
Indigenous Peoples, and inclusive economic development, through the adoption of practices that integrate conservation needs and development priorities.	exploitation of natural resources. <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. Furthermore, all people have a duty to safeguards and enhance the environment and participate in the development, execution, management, conservation and protection of the natural resources and the environment.		
ESS 10: Stakeholder Engagement and Information Disclosure			
The Objectives of ESS 10 are: To establish a systematic approach to stakeholder engagement that will help Borrowers identify stakeholders and build and maintain a constructive relationship with them, in particular project-affected parties. 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.	<u>Provisional Constitution of the Federal Republic of Somalia.</u> Article 32 stipulated that every person has the right of access to information held by the State. The Federal Parliament shall enact a law to ensure the right of access to information	The law on the right of access to information currently only exists as a draft	The sub-project has implemented stakeholder consultations and will continue to do so, in line with the Project Stakeholder Engagement Plan (SEP) The SCRP GRM is implemented in the sub-project area

ESF Objectives	National Laws and Requirements	Gaps	Recommended Actions
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. 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. 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.			

3. Biophysical and Socio-Economic Environment

This section describes the overall baseline condition of Gedo Region in Jubaland, in terms of biophysical environment, as well as the socio-economic background. The target locations are the four existing Luuq Roads.

3.1. Proposed Project Location

The proposed project is located in Luuq District of Gedo Region, Jubaland State of Somalia. Luuq, also known as Luuq Ganaane, is one of the oldest districts of Gedo region of Jubba land state of Somalia. It locates at the bend of Juba River, where the Juba river flows down from north to south in a horseshoe shape. The district borders Ethiopia and Rabdure (Bakool Region) to the North, Wajiid District (Bakool), and Berdaale District (Bay Region) District to the East, Garbaharey District to the South and Beled Hawa and Dolow Districts to the West. The district has an estimated geographical area of 8,258 km².

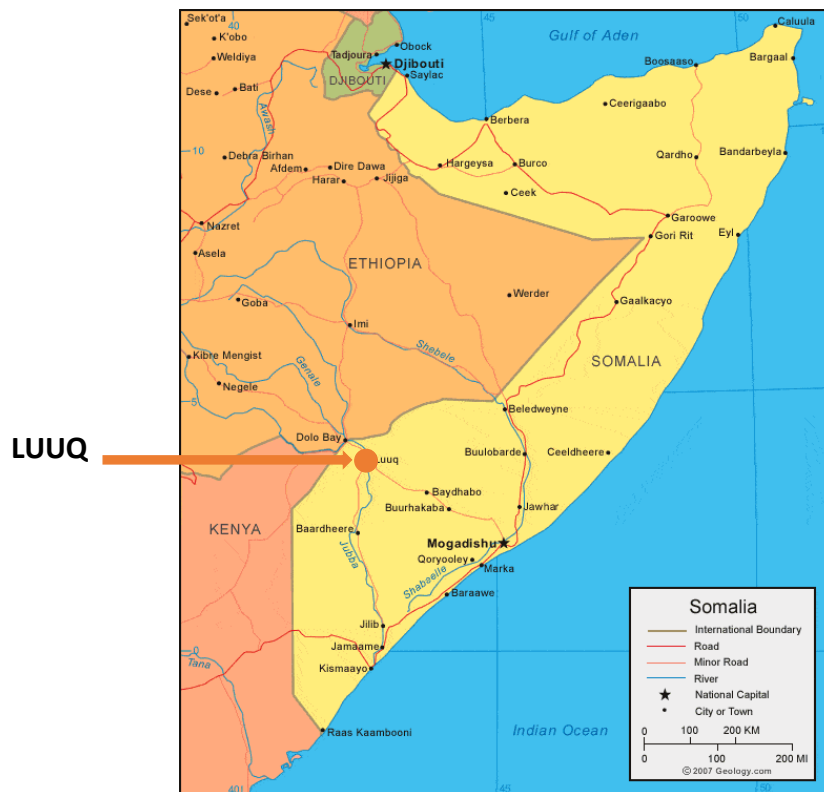


Figure 1 Location map

3.2. Physical Environment

Topography: Luuq town lies in the lower regions of Gedo, with elevations between 140 and 200m above sea level. The google map below with the elevations indicated describes the pattern obtaining in the project area.

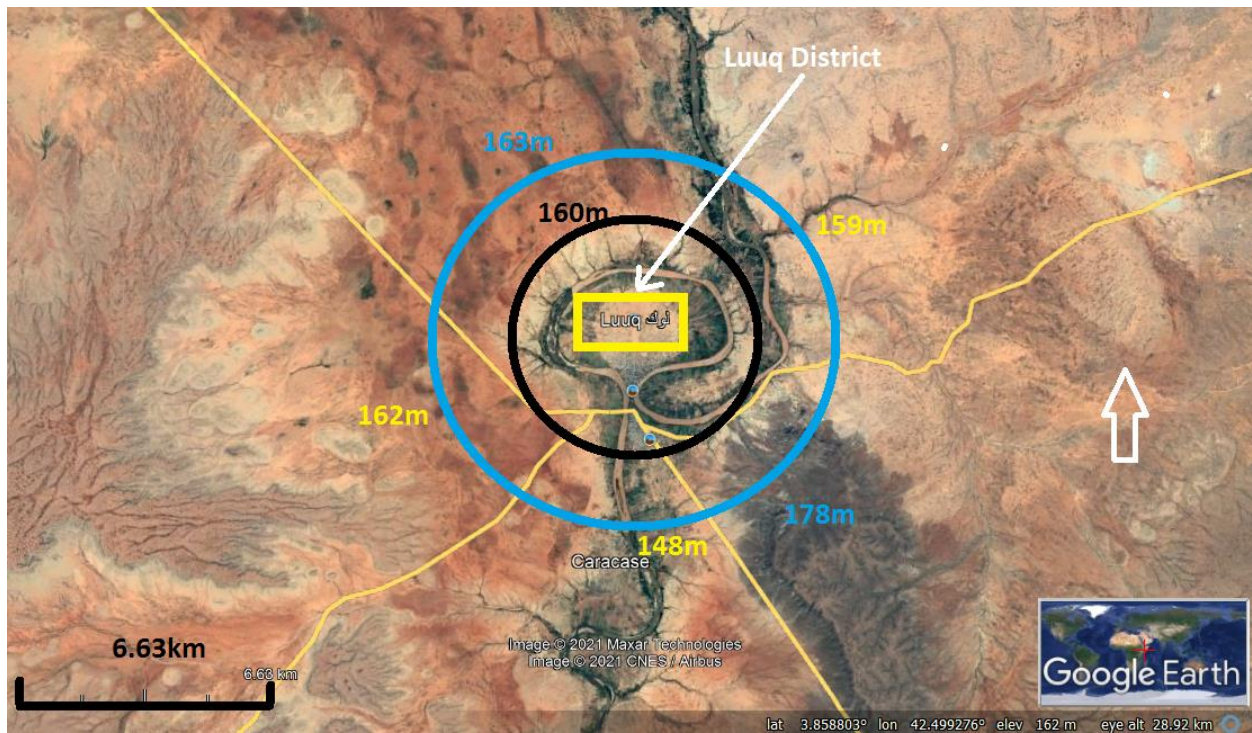


Figure 2: Google map showing topography of the project area

Figure 3 shows a topographic map of the locations of the roads to be rehabilitated.

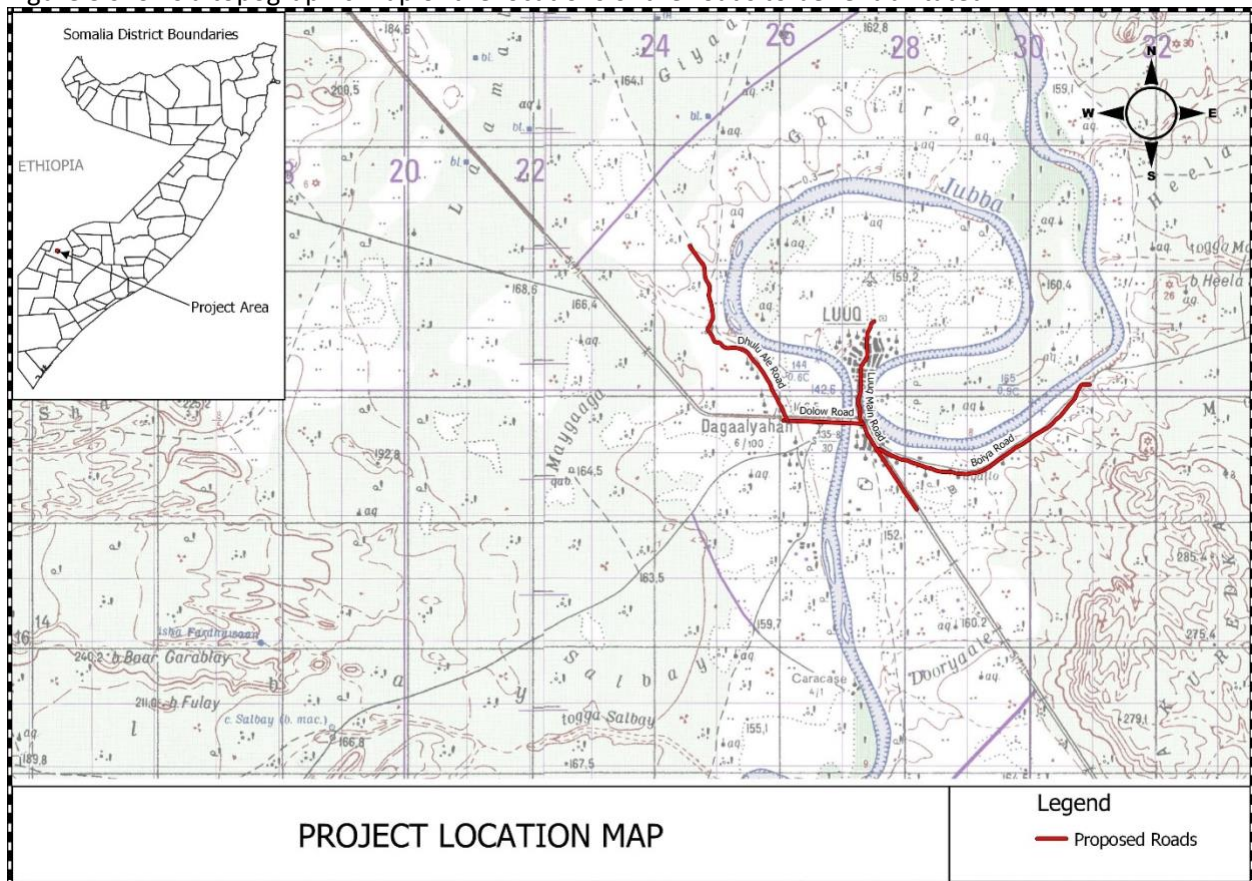


Figure 3 Topographic map of project locations

Soils: The general soil conditions within the project area is silty sand soil and clay sand near the river banks. The regional geology of the Luuq area comprises of the Luuq-Mandera basin that comprises of sandstones, gypsum, shales and quaternary sediments with firm to hard silty clays or sandy clays the rocks.

Laboratory tests carried out on soil samples collected along the roads rate the natural subgrade soils are fair to poor according to the AASHTO soil classification system. The soils can be described as high plasticity clayey soils.

The Maximum Dry Density (MDD) and the Optimum Moisture Contents (OMC) of the alignment soils are consistent with typical values for clayey soils. The MDD and OMC range between 1678kg/m³ to 1585kg/m³ and 10.2% - 13.5% respectively.

An extract of the geological map of the area is shown in the Figure below.

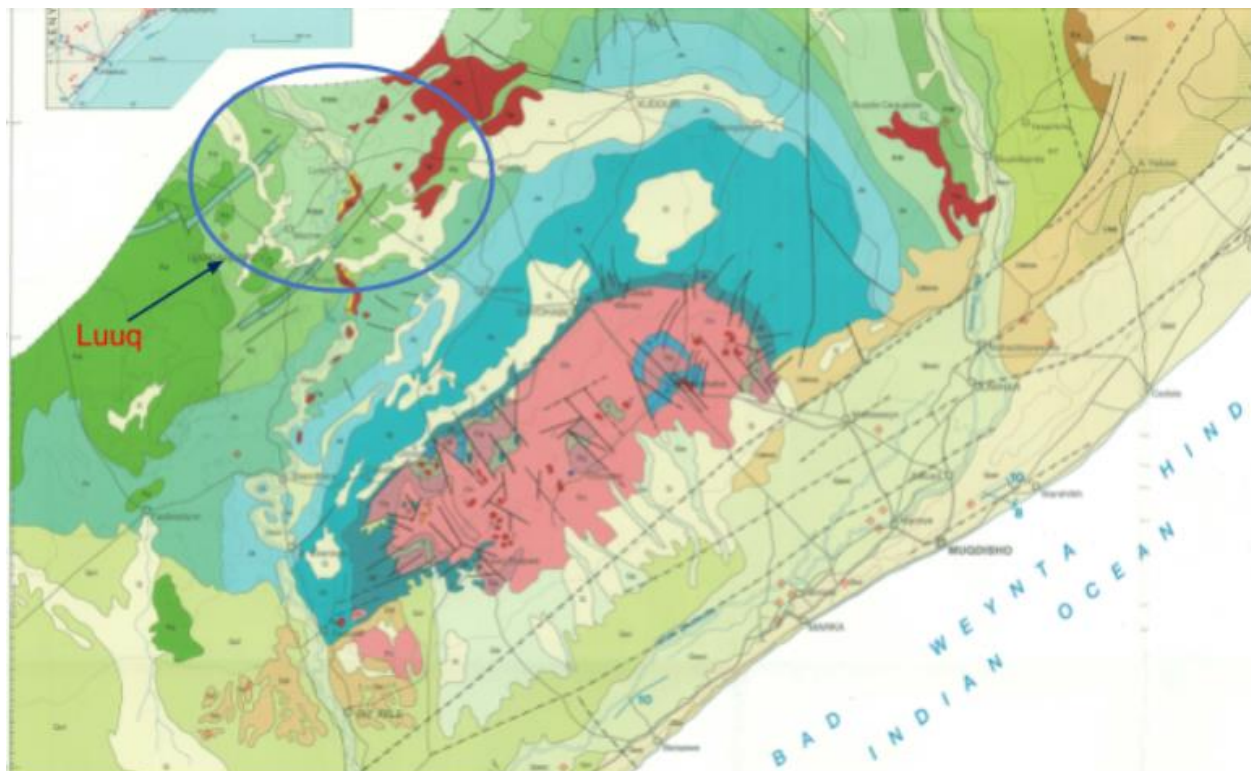


Figure 4 An extract of the geological map of central and southern Somalia

Climate: The Inter-Tropical Convergence Zone (ITCZ) influences Somalia's climate and varies from arid to semi-arid and from tropical to sub-tropical depending on the spatial location.

In general, Somalia has two rainy and two dry seasons. According to 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.

The annual and daily rainfall record for Luuq station were obtained from the FAO SWALIM website.⁷ Records of the annual maximum 24-hour annual daily rainfall for each year on record for Luuq stations were derived from the daily rainfall data record and the resulting data presented as in the Table below.

Table 2 Annual Maximum 24-hour rainfall series at Luuq station⁸

Year	Luuq Station	
	Location Ref. 3.58333N, 42.45 E	
	max. 24hr rainfall (mm)	Annual rainfall (mm)
2007	28	202.50
2008	28	190.50
2009	27.5	79.50
2010	144	305.50
2011	62	266.00
2012	29	143.00
2013	54	252.50
2014	37	162.00
2015	52.5	304.50
2016	106	279.00
2017	37.5	185.50
2018	94	413.00
2019	42	361.00
2020	75	223.00

Luuq town has a hot climatic condition with little rainfall. The temperature is always high, and the areas are cyclically tropical by drought and the floods, which adversely affect the farm-based livelihoods. Several consecutive seasons of rain failure have led failed crop harvesting driving many people into food insecurity. The district is still crippling with the numerous human attributed activities and natural setbacks. Recurrent droughts and floods coupled with unsustainable agricultural practices and the absence of enabling environment have exposed many to the impacts of climatic shocks.

⁷ https://climseries.faoswalim.org/rainfall/data/mrs/MRS_GELUU

⁸ SWALIM – Somalia Water and Land Information Management resources base, FAO

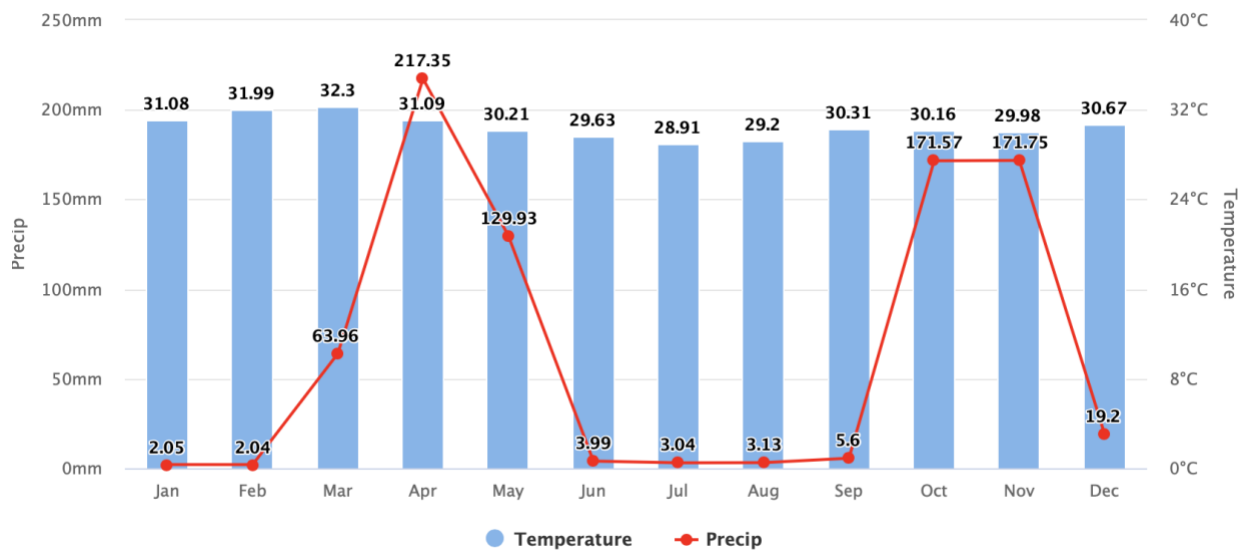


Figure 5 Gedo Temperature by month⁹

Month	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Nov	Oct	Dec	Year
Record high °C (°F)	38.0 (100.4)	40.0 (104.0)	40.0 (104.0)	39.0 (102.2)	37.0 (98.6)	37.0 (98.6)	36.0 (96.8)	37.0 (98.6)	38.0 (100.4)	38.0 (100.4)	36.0 (96.8)	37.0 (98.6)	40.0 (104.0)
Average high °C (°F)	35.45 (95.81)	36.71 (98.08)	36.58 (97.84)	34.35 (93.83)	33.43 (92.17)	32.99 (91.38)	32.4 (90.32)	33.12 (91.62)	34.52 (94.14)	33.24 (91.83)	32.91 (91.24)	34.2 (93.56)	34.16 (93.49)
Daily mean °C (°F)	31.08 (87.94)	31.99 (89.58)	32.3 (90.14)	31.09 (87.96)	30.21 (86.38)	29.63 (85.33)	28.91 (84.04)	29.2 (84.56)	30.31 (86.56)	30.16 (86.29)	29.98 (85.96)	30.67 (87.21)	30.46 (86.83)
Average low °C (°F)	24.5 (76.1)	25.27 (77.49)	26.23 (79.21)	26.42 (79.56)	25.32 (77.58)	24.47 (76.05)	23.85 (74.93)	23.65 (74.57)	24.13 (75.43)	25.42 (77.76)	25.52 (77.94)	25.26 (77.47)	25.0 (77.0)
Record low °C (°F)	19.0 (66.2)	18.0 (64.4)	21.0 (69.8)	20.0 (68.0)	24.0 (75.2)	22.0 (71.6)	21.0 (69.8)	21.0 (69.8)	21.0 (69.8)	22.0 (71.6)	16.0 (60.8)	19.0 (66.2)	16.0 (60.8)
Average precipitation mm (inches)	2.05 (0.08)	2.04 (0.08)	63.96 (2.52)	217.35 (8.56)	129.93 (5.12)	3.99 (0.16)	3.04 (0.12)	3.13 (0.12)	5.6 (0.22)	171.57 (6.75)	171.75 (6.76)	19.2 (0.76)	66.13 (2.6)
Average precipitation days (≥ 1.0 mm)	0.45	0.36	6.55	19.73	12.45	0.91	1.09	0.55	1.0	15.73	16.36	3.45	6.55
Average relative humidity (%)	31.33	33.14	40.47	55.05	58.29	51.85	49.65	48.43	46.19	53.57	53.55	38.31	46.65
Mean monthly sunshine hours	11.55	11.57	11.26	10.86	12.12	11.36	10.94	11.07	11.53	11.34	10.68	11.06	11.28

Figure 6 Climate Gedo, monthly averages¹⁰

⁹ Gedo Somalia Climate, accessed at: <https://tcktkctck.org/somalia/gedo>

¹⁰ Gedo Somalia Climate, accessed at: <https://tcktkctck.org/somalia/gedo>

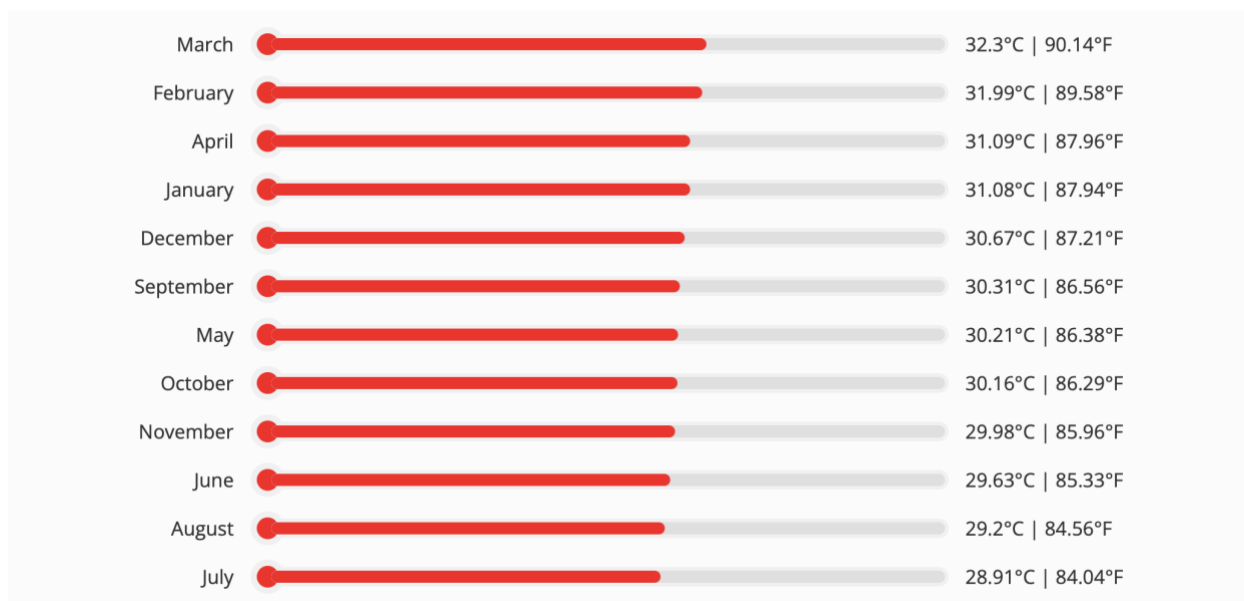


Figure 7 Mean monthly temperature and precipitation of Gedo in recent years¹¹

Water Resources and Hydrology: Groundwater is of significant importance in Somalia. But the concern with the same groundwater is the quality, for human consumption. Most groundwater sources have salinity levels above 2,000 µS/cm. Many shallow wells are also unprotected and vulnerable to microbiological and other contamination (FAO/ 2012).

Specific to the project area, two major rivers run through the Gedo Region, the Dawa and the Juba. The Dawa River runs along the border of Ethiopia into Somalia's Gedo region. The Jubba River starts from Doloow, just north of Luuq district, and flows to Buur Dhuubo and Baardheere. In this respect, the riverine zone extends from east to west below West Golis and is mainly a farming area where crops such as sorghum are produced.

Given the project area's geographical location and the challenges of floods in the area, the Luuq District experiences riverine floods, which negatively impact on critical infrastructure. The two major rivers which run through the Gedo Region, namely the Dawa and the Juba Rivers are a major source of agricultural produce as these rivers provide the needed water for irrigation. On the other hand, the proximity to the river causes the constant flooding, which regularly damages infrastructure. Agricultural areas are located closely to the river channel to facilitate irrigation.

Over the last few decades, disasters have more than quadrupled, both in number and in the size of their impact and climate change threatens to make this trend even worse. Gedo Region has not escaped from this trend as it is suffering from increasingly frequent and devastating floods.

¹¹ Gedo Somalia Climate, accessed at: <https://tckctck.org/somalia/gedo>



Figure 8 Pictures showing extent of floods in between Luuq and Dolow

Over the years, the floods in the city have affected a number of infrastructures.

Drainage: The project area lies about 400 km northwest of the capital Mogadishu along the Webi Jubba river. Drainageways crossing Boya Road and Dhulu Ale Road run perpendicular to the road alignment with the Webi Jubba river as the outfall for all of the proposed roads in the town. The Webi Jubba river lies within the greater Jubba River catchment, a transboundary catchment covering an area of about 749,000 km².

The average slope percentage of the catchment area of the project area is 4.5%, which can be termed as rolling based on the TRRL classification presented below

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

The basins differ in size, length, width, shape, and elevation. The landforms vary from hilly in the outskirt of the town to moderately flat terrain in areas around the town. The outskirts of the town are largely

undeveloped bushlands on the upstream side of the catchment with intermittent streams that intersect the project roads at different chainages. The catchments areas intersecting the project roads were delineated using GIS software Global mapper¹² from the SRTM digital elevation model data and verification done using 1:50,000 topographical map of the study area. The catchment boundaries are shown as in the Figure below.

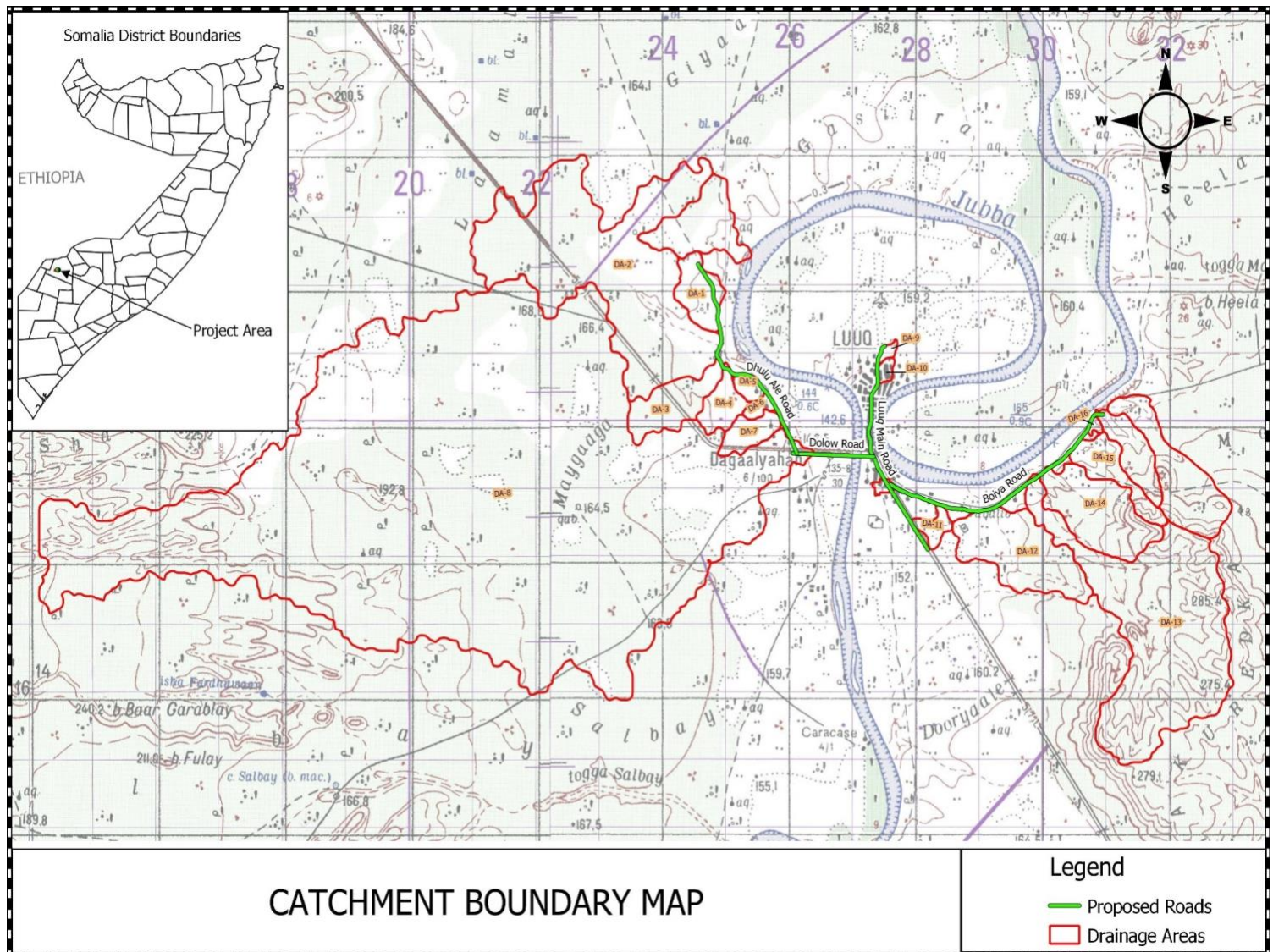


Figure 9 Drainage area map

Biological Environment: The major conservation opportunities in southern Somalia are concerned with river-related ecosystems, such as the Jubba forests. The vegetation type in some very limited parts of the Jubba plains, where the subproject is located, consists of woody plants, mainly shrubs with less than 6m height with trees grown sporadically here and there. The canopy cover ranges from dense to fairly open in most area. Plant species including *Acacia tortilis* and annual grasses, such as *Chloris* and *Dactyloctenium* are common in this area. Apart from bushland, woodland is found in Gedo region, standing to about 18m high with either open or continuous canopy, but not interlaced. However, as indicated earlier, most of

these vegetation types have been turned into secondary bush through shifting cultivation that is practiced by hunter-cultivators from 1976 and compounded by the increase in livestock in the area, putting more pressure on the few scattered habitats.

The riparian forest along the banks of Jubba River has been growing along the banks and in the beds of the streams with *Diospyros*, *Garcinia* and *Ficus* species of trees. The vegetation around permanent watering places had been altered by cattle grazing and human activities..

3.3. Socio-Economic Environment

Luuq Town and District: Luuq is a town in gedo region in southwestern Somalia. The town is located in the bend of the Juba river, and is one of the older towns in the region with significance in the caravan trade during medieval times. In 2011 the Transitional Federal Government forces captured Luuq town from Al-Shabaab. In 2013, Luuq and other settlements in the Gedo region were officially incorporated into Jubaland State.

Population of Luuq District: The district has an estimated population of about 65,000 people living in the Luuq town, but the total population of the district is estimated at 185,703 people.¹³

Internally Displaced Persons (IDPs) and Vulnerability: Luuq's most vulnerable population are its IDPs. Most of the IDPs have arrived in Luuq due to drought displacement, either from rural areas in Luuq district, Baidoa or Doolow. The severity scores of IDPs in regards to food security, health and WASH are currently 'extreme'.¹⁴ At present, in May 2022, there are 34 verified IDP sites in Luuq, with a total of 8233 households and 51,028 individuals.¹⁵ IDP presence places greater stresses on the existing health and educational facilities.

Health and Education: Luuq town has two primary schools, Horsed Primary School and Korey Primary School; as well as one secondary school, the Luuq Secondary School. Luuq town has one hospital, 'Luuq Hospital'.

Gender-Based Violence (GBV): GBV is widespread in Somalia, and considered to be a major obstacle to equality, peace and development in the country. There is a general lack of comprehensive and reliable national population-based GBV prevalence data as well specific data on GBV in Luuq. However, general information that does exist indicates that GBV is common in the lives of women and girls across the life course in Somalia, with some forms of GBV endemic. Female Genital Mutilation/Cutting (FGM/C) has in the past been near universally practiced. Intimate partner violence and sexual violence, the most prevalent types of GBV globally, are both commonplace in the lives of Somali women and girls, although there is limited data on which to estimate reliable prevalence and trends in perpetration and victimization rates over time. Sexual exploitation and abuse of children and women by people in positions of authority and power are reportedly common in Somalia, and as elsewhere, linked to poverty, insecurity and

¹³ Norwegian Refugee Council, Building Resilient Communities in Somalia

¹⁴ REAC Somalia, Detailed Site Assessment, Luuq District, 2022, accessed at: <https://reliefweb.int/report/somalia/detailed-site-assessment-dsa-luuq-district-gedo-region-somalia-march-2022>

¹⁵ Luuq IDP Site Verification, May 2022, accessed at: <https://reliefweb.int/map/somalia/somalia-verified-idp-sites-luuq-march-2022>

impunity.¹⁶ Although the issue remains under-researched due to the significant sensitivities associated with it, there is evidence of high levels of sexual exploitation and abuse by domestic and foreign security forces and by civilians.¹⁷ Anecdotal evidence from humanitarian and development agencies indicate that sexual exploitation and abuse is a largely unreported and significant problem in the country.

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 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.

Road Infrastructure: Luuq roads facilitate movement of farmers and their farming inputs/products to various destinations. The roads once done will also provide easy access to various places for efficient delivery of local services.

Luuq is one of the oldest agricultural settlements in Gedo region of Somalia yet has the poorest infrastructure. The poor road infrastructure has mainly been worsened by poor maintenance and the lack of maintenance schedule and capacity building in this respect. Although there may not be urban planning laws in place, it is possible to move towards sustainable development with good coordination among the actors active in the district, and following some basic town planning principles. If no particular urban planning effort is undertaken, current unsustainable development trends can be expected to continue and urban problems, especially those related to the management of the Jubba River, will rapidly intensify.

Luuq town is situated in an oxbow of the Webi Juba River. The four roads under the current project are: Boiya road and Dhulu Ale Road that run almost parallel to the river ;and Dolow road, which is perpendicular to the river with a bridge crossing at chainage 0+230m. The bridge is in relatively good condition and is not part of this project.

Existing Road Status

Dolow Road: is a main road that connects Luuq to Doolow district and beyond to Ethiopia. The road starts from the main bridge across Jubba river. It is a 7m wide road that was initially a paved road with a stone base and subbase. The road is lightly trafficked, mostly by small vehicles transporting agricultural products from the farms to the town. The road's present condition is very poor, the surface has completely been washed out and the base is disintegrated. Some sections are low and gets flooded frequently when the river breaks its banks. The culverts along this road are clogged and dysfunctional.

There are several natural seasonal waterways crossing the road but there are no commensurate drainage structures. Dolow road has two pipe culverts; ø900mm corrugated pipe at chainage 0+050m, ø600m

¹⁶ See Reports of the United Nations Secretary-General on Sexual Violence in Conflict S/2019/280 and 2018/250; Human Right Watch "The Power These Men Have Over Us" *Sexual Exploitation and Abuse by African Union Forces in Somalia*, HRW, 2014b, New York.

¹⁷Human Rights Watch 2014.

double concrete pipe culverts at chainage 0+585m and a box culvert at road station 0+985m. The pipe culverts do not have screens and are clogged. The box culvert is also completely clogged and has dilapidated wingwalls.



Figure 10 Left: View of Dolow Road, Right: Blocked culvert inlet

Dhul Alle Road: is an earth road giving access to the riverine farms and villages on the Western part of town. It branches-off the Dolow road at 900m from the main bridge. Being a continuation of Dolow road, the traffic on Dhul Alle road is similar to Dolow road. The road is in poor condition and is impassable during the flood season. The road crosses low sections where the river floods reach. There are other sections where the road crosses flood channels from the overland flush floods.

The terrain starts flat and changes to undulating towards the end of the road. The soil conditions along this road varies from clay to sandy and rocky gravel.



Figure 11 photos of Dhul alle Road

Boyia Road: branches -off the Luuq- Mogadishu main road and runs parallel to Juba river. It provides access road to the farming villages along the riverine areas. It is also has low traffic volumes that consist of small vehicles and hand/donkey -push carts transporting farm produce to the markets in the town. Currently, it is a poor earth road that is impassable during the rainy season. Heavy flush flood channels cross at sections along the road and have caused erosion. Soil conditions vary from clay to rocky gravel, sandy soils. There are no drainage structures installed on the road and as such the road acts a drainage canal at some locations.



Figure 12 photos of Boyia Road

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

Dhul alle (3.5km), Doolow (0.9km) and Boyia (4km) meet the 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.
- These were requested by the State and the local administrations and supported during the local community consultation process
- The roads connect the rural farming areas to the markets / livelihood support, an objective of C2
- Solution to the perennial flooding problem can be resolved by incorporating Build-back better principles i.e. providing appropriate drainage facilities in the design 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 and social compliance
- The estimated cost of the rehabilitation works is within the available budget for C2 works in Jubaland State

Figure 15 below shows the location of the project roads in Luuq District.



Figure 13 Luuq Roads Lay Out

4.2. Proposed Intervention

The proposed intervention will improve the road profile, road pavement and the surfacing, and the drainage provisions. All roads are designed to have gravel riding surfaces.

The proposed rehabilitation will consist of the following: scarifying the existing road surface up to 150mm and compacting it to form the subgrade layer, laying of the base layer of 200mm according to specifications. On some sections, in order to improve the vertical profile of the road, embankments will be constructed by means of fill layers. On such sections, the subgrade and base layers will be constructed on completion of the embankment.



Figure 14 Sample photos of blocked drainage structures

The following table gives the list of structures proposed by the design:

Table 3 List of Structures proposed

Catch. No	Road Name	Approx. Location (km)	Size	Discharge capacity (m ³ /s)
1	Dhulu Ale	2+580	1 cell 1.5mx2m RCBC	6.25
2	Dhulu Ale	3+260	1No. Ø900mm CPC	1.075
3	Dhulu Ale	2+120	2 cell 1.5mx2m RCBC	12.49
4	Dhulu Ale	1+860	2No. Ø900mm CPC	2.15
5	Dhulu Ale	1+830	1No. Ø1200mm CPC	2.21
6	Dhulu Ale	1+360	2No. Ø600mm CPC	0.78
7	Dhulu Ale	0+980	1No. Ø600mm CPC	0.39
8	Dhulu Ale	0+620	3No. Ø600mm CPC	1.17
12	Boiya Road	1+700	2No. Ø1200mm CPC	4.42
13	Boiya Road	2+460	2 cell 1.5mx2m RCBC	12.49
14	Boiya Road	2+800	2No. Ø1200mm CPC	4.42
15	Boiya Road	3+430	2No. Ø900mm CPC	2.15

16	Boiya Road	3+780	1No. Ø600mm CPC	0.39
17	Dolow Road	0+985	2cell 2mx2.5m RCBC	24.04
18	Dolow Road	0+585	1 cell 1.5mx2m RCBC	12.49
19	Dhulu Ale	0+000	2No. Ø900mm CPC	2.15

RCBC – Reinforced Concrete Box Culvert

CPC – Concrete Pipe Culvert

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 Luuq. The team visited Luuq in May 2021 and assessed roads and infrastructure. This was a follow-up assessment after the initial reconnaissance assessment made by the advance team in March 2021.
- Consultation - The stakeholder consultation involving both the State and local authorities and the local communities were conducted, by PIU and UNOPS staff (see stakeholder engagements below).
- Surveying - collection of topographic data and developing a digital terrain model for design.
- Geotechnical Investigations - identification of material sites, carrying out insitu 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 was 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. The designed alignment follows the existing alignment. A cross section of the designed pavement is shown below.

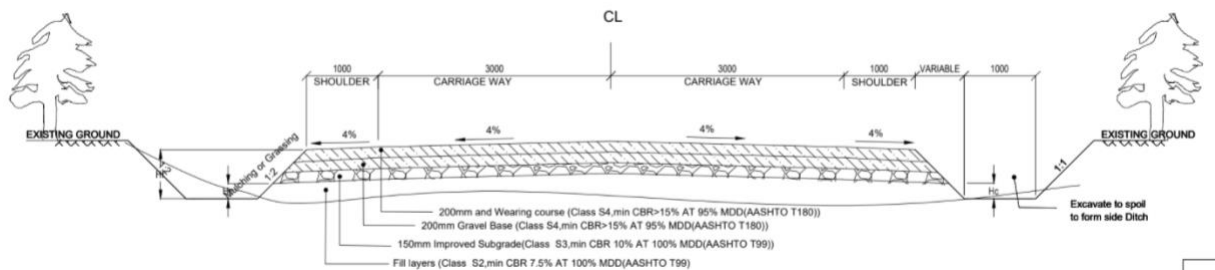


Figure 15 Cross Section of Pavement

Construction Phase:

- Setting up of the Contractor's construction yard.
- Identification and construction of diversions and allowing for passage of traffic during works implementation.
- Identification of material borrow sites for natural materials including gravel and aggregates and seeking requisite approvals.

- Identification of spoil areas for disposal 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. The stripped soil will be reused on the road embankments for grass planting.
- Earthworks, which include all activities undertaken to form the road foundation such as excavation, filling and compaction and construction of subgrade layers.
- Construction of Gravel Wearing Course (150mm) depth
- Construction of concrete pipe culverts (approx. 250m)
- Construction of concrete Box culverts (5 No.)
- Road furniture inclusive of road signs 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
- Implementation of the ESMP which includes: provision of PPE to workers, carrying out OHS training, provision of safety signs and provision of latrines for workers.

The following resources, both equipment and human, are expected to be deployed during the construction phase of the project:

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	1
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	4
7.	Concrete Mixer (0.7m ³ /min) and Poker vibrator set	2
8.	Cat 950G Wheel Loader or Equivalent (2.9-4.4 m ³ bucket capacity).	1

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 – Earth Works	1

7.	Construction Foreman – Concrete Works	1
8.	Semi-skilled workers	15
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.
- 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.

5. Environmental and Social Risks and Impacts

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

5.1. Positive Impacts

- The rehabilitation of the roads as per the new design with provisions for drainage improvements will remedy damages done by drainage flooding and will contribute to a sustainable road infrastructure.
- The rehabilitated roads will provide an important transport route connecting urban and rural areas, with improved accessibility to health, education, other services and for livelihood opportunities in the town for the rural populations.
- The road with properly designed and constructed side drains and culverts will guide the storm water flows and control soil erosion.
- Improved road surface would result in fuel efficiency and vehicle maintenance costs savings.
- Travel time savings to contribute to productive activities.

5.2. Negative Risks and Impacts

The activities associated with the rehabilitation of the Luuq Roads 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,
- 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.
- 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 the Luuq Roads, there are no land and resettlement impacts, nor temporary or long-term economic impacts.

Ground topographical surveys were carried out by UNOPS team which formed the basis of the design. The proposed design fits within the available right of way (ROW) and avoids encroachment into private property. Temporary diversions will also be within the ROW. Upon mobilisation, the contractor will identify a piece of land to put up the contractor's camp. The location and acquisition (buying/leasing) of the land for the camp will be entirely at the contractor's discretion upon mobilization.

One (1 No.) potential material site was identified and representative samples were subjected to laboratory testing to assess their suitability for use in pavement construction. The final selection of the material sites will be with the contractor.

Figure 16 Construction material sources

Material	Source	Distance	Quantity	Remarks
Gravel	Luuq	4Km	Adequate	Test results attached in Annex I
Hard stone/ Rock	None	15km		
River Sand	None	15km		
Water	River Jubba		Adequate	

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 4: Environmental & Social Management Plan: Rehabilitation of Luuq Roads

WB ESF	E&S Risks and Impacts	Mitigation Measures	Responsibility	Budget for mitigation (in USD)	Monitoring Indicator	Monitoring Frequency
ESS 1: Assessment and Management of Environmental and Social Risks and Impacts						
ESS 1	Preparation Phase					
	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)	Implement SEP and create awareness of GRM	SPT / PIU	Included in PIU staff costs Travel costs: 2,000	# of GRM cases filed # of stakeholder engagements conducted	at the beginning of activity and throughout implementation
	Construction Phase					
	Implementation of the respective mitigation measures against the negative impacts identified in this ESMP	- Provide H&S Training to the construction workforce (including sub-contractors, temporary workers and drivers) - Raise awareness to the workforce regarding the implementation of the ESMP tailored to the project scope, through toolbox talks and other platforms	Contractor	1,000 USD for logistics	# of H&S Training session # of awareness raising session	At the beginning of construction activity
ESS 2: Labour and Working Conditions						
ESS 2	Construction Phase					
	Risk of Insecurity of all project workers	Project Implementation Unit (PIU) to prepare	PIU / Contractor	Costs for security risk implementation	# District Security Risk Assessments	Prior to commencement of activity

WB ESF	E&S Risks and Impacts	Mitigation Measures	Responsibility	Budget for mitigation (in USD)	Monitoring Indicator	Monitoring Frequency
		District Security Risk Assessment - PIU to prepare local Security Management plan (SMP) - Contractor to prepare local Activity Security Plan - Implementation of SMP and local Activity Security Plan			# of Local Security Management Plans # of Local Activity Security Plans	
	Risk of labor and working conditions of all the workers don't comply with WB and Somali legislation.	- Implement and monitor the LMP - Listing of all staff and titles, new hires and departure - Site visited and records reviewed, major findings, and actions taken by contractor, engineer, or others, including authorities—to include date, inspector or auditor name	Contractor	Incl in contractor staff costs	Availability of register 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	- Provide hearing protection where necessary (when sound level over 8 hours reaches 85 dB(A)) - Use of acoustic insulating materials, isolation of noise source, and other engineering controls	Contractor	Incl. in contractor budget	% of workers that have been provided with hearing protection # of equipment with vibration	monthly

WB ESF	E&S Risks and Impacts	Mitigation Measures	Responsibility	Budget for mitigation (in USD)	Monitoring Indicator	Monitoring Frequency
		- Control vibration through choice of equipment, installation of vibration dampening pads or devices, and limiting the duration of exposure - provide temporary shelters to protect against the elements during working activities or for use as rest areas. - Monitor weather forecast for outdoor work - Adjust work and rest periods according to temperature - Training and licensing of industrial vehicle operators in the safe operation of specialized vehicles. - Ensure drivers undergo medical surveillance - Establish rights of way, site speed limits, vehicle inspection requirements, operating rules and procedures - Use of mechanical assists to eliminate or reduce exertions required to lift materials, hold tools and work objects			dampening pads or devices # of temporary shelters available # of trainings for industrial vehicle operators conducted % of heavy vehicle operators that have been subjected to medical surveillance # of site speed limit signs at construction site # of rest and stretching breaks per work day	

WB ESF	E&S Risks and Impacts	Mitigation Measures	Responsibility	Budget for mitigation (in USD)	Monitoring Indicator	Monitoring Frequency
		- Incorporate rest and stretching breaks into work processes and conduct job rotation - Implement quality control and maintenance programs that reduce unnecessary forces and exertions				
	Risk of labor influx leads to increase of GBV cases	- All workers to sign CoCs before commencement of their assignment (see annex 4) - Dedicated reporting channel for victims through Project GRM	Contractor	Incl in contractor staff costs	% of workers that signed COCs	At start of project
	Risk of discrimination against women in employment	- Contractor to develop recruitment and retention policies that enable fair working conditions and women's safe and equitable participation. - All workers to sign CoCs before commencement of their assignment.	Contractor	Incl in staff costs	# of recruitment and retention policies available % of workers that signed COCs	At start of project
	Risk of delayed payment or underpayment of workers, leading to complaints and conflict	- Ensure provision of timely payment - Ensure provision of workers' GRM	Contractor	Incl in contractor staff costs	% of payments made on time # of workers' grievances filed	Monthly

WB ESF	E&S Risks and Impacts	Mitigation Measures	Responsibility	Budget for mitigation (in USD)	Monitoring Indicator	Monitoring Frequency
	Risks of child and forced labor resulting in employing of underage children and human trafficking	- Set-up of a workers' GRM to ensure their voices / complaints are heard - Contractor to maintain staff records, ID copies.	Contractor	Incl in contractor staff costs	# of GRM cases filed # of child and forced labor reported	Throughout the project's life cycle
	Risk of spreading COVID 19 at work place	- Contractor to ensure workers have access to face masks and sanitizers. - Regular sensitization on COVID 19 to ensure workers observe the social distancing especially when in the community and public places	Contractor	Incl in contractor staff costs	# of sites with face masks and sanitizer available # 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	- 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. - Workers' GRM in place - Regular fire drills	Contractor	Contractor's budget	# of regular reviews conducted # of grievances logged # of fire drills conducted	Monthly
	Risk of traffic and road safety for Project workers	- Include traffic and road safety into the daily toolbox talks. - Emphasize safety aspects among drivers	Contractor		# of daily toolbox talk that include road safety talks # of accident reports	monthly

WB ESF	E&S Risks and Impacts	Mitigation Measures	Responsibility	Budget for mitigation (in USD)	Monitoring Indicator	Monitoring Frequency
		• Improve driving skills of drivers • Requiring licensing of drivers • Adopt limits for trip duration, e.g. 8 hours at a time • Arrange driver rosters to avoid overtiredness • Preassign routes by construction vehicles (project management, contractor, and traffic authorities) before construction starts. • Regular maintenance of vehicles and use of manufacturer approved parts to minimize potentially serious accidents caused by equipment malfunction.			# of register of vehicle maintenance	
ESS 3: Resource Efficiency and Pollution Prevention and Management						
ESS 3	Construction Phase					
	Impacts of generation of solid waste	• Ensure disposal of generated solid waste at designated and authorized disposal site consistence with the local and international requirements (see	Contractor	waste management costs 10,000 USD lump sum per site	# of records of amount of solid waste disposed, where and when # of grievances filed	monthly

WB ESF	E&S Risks and Impacts	Mitigation Measures	Responsibility	Budget for mitigation (in USD)	Monitoring Indicator	Monitoring Frequency
		WBG General EHS Guidelines)¹⁸ • Ensure mechanisms exist for community to bring forth any complaints/feedback concerning the waste disposal by the contractor – Project GRM • 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			# of records of amount of solid waste disposed, where and when	
	Risk of poor sanitation facilities and sanitation conditions at work site	• Provide proper water closet toilet facilities at all long term (> 1 month) work sites.	Contractor	5,000 USD	# of water closet toilet facilities available	monthly

¹⁸ 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
		- Do not allow water to run out at toilets. - Maintain all toilets in clean and sanitary condition. - Provide proper earth pit latrines at all work sites where work will be undertaken for periods of up to one month. - Fill the latrines in once they become full and when site work is complete. - Do not allow site workers to defecate in the open anywhere on the site or in its vicinity. - Add the use of sanitation arrangements in toolbox talks			% of toilets leaking Toilets are well maintained # of latrines provided % of latrines filled # of workers openly defecating # of toolbox talks including Sanitary arrangements	
	Risk of pollution from construction wastes and water use on groundwater	Through accurate estimation of the sizes and quantities of materials required, order materials in the sizes and quantities they will be needed, rather than cutting them to size, or having	Contractor	Incl in contractor staff costs	# of construction materials left over at the end % of waste at construction site is disposed of appropriately	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
		large quantities of residual materials. • Ensure that construction materials left over at the end of construction will be used in other projects rather than being disposed of. • Ensure that damaged or wasted construction materials will be recovered for refurbishing and use in other projects • Donate recyclable/reusable or residual materials to local community groups, institutions and individual locals or home owners. • Dispose waste more responsibly by dumping at designated dumping sites or landfills only. • Waste collection bins to be provided at designated points on site			# of waste bins available at construction sites	
	New Material sites and borrow pits	• Once material sites and borrow pits are	PIU/Contractor	5000USD	Availability of adequate E&S	Before activity commencement

WB ESF	E&S Risks and Impacts	Mitigation Measures	Responsibility	Budget for mitigation (in USD)	Monitoring Indicator	Monitoring Frequency
		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. • Upon works completion rehabilitate borrow pits and quarries; • Only licensed borrow pits will be selected			plan that includes rehabilitation for management of new quarries and borrow pits in place	
Operational Phase						
	Risk of soil erosion	• Mulching to stabilize exposed areas • (re)-vegetation of soil areas	Contractor	3000 USD	% of soil areas have been vegetated	After finalization of construction
ESS 4: Community Health and Safety						
ESS 4	Construction Phase					
	Risk of increased GBV/SEAH cases and risks of sexual exploitation and abuse or sexual harassment, such as requests for sexual favors by project workers	• Implementation and monitoring of GBV / SEA Action Plan • GBV awareness sessions for community	PIU	Incl in PIU staff and travel costs	Activities under GBV/SEA Action Plan implemented	monthly

WB ESF	E&S Risks and Impacts	Mitigation Measures	Responsibility	Budget for mitigation (in USD)	Monitoring Indicator	Monitoring Frequency
		- GBV awareness sessions for workers. Engage a dedicated specialist to support oversight and management of these risks - Workers to sign COC			# of GBV awareness sessions # of sessions # of specialists engagement % of workers that have signed CoC	
	Risk of spread of communicable diseases (SILs , HIV/AIDS, COVID-19 etc..) between workers and the community	- Community awareness sessions on communicable diseases - Implement COVID-19 protection measures	PIU	Incl in PIU staff and travel costs	# of community sensitization % of workers that have signed CoC % or works with access to face masks and sanitizer	monthly
	Risk of floods	- Elevation - drainage	Contractor	Incl. in contractor budget	0 flooding reported	monthly
	Risk of exposure of community members to physical hazards on project sites.	Sensitize the local community on the activity of type project and inform them about construction risks and the restricted access to the site	Contractor	Inc in Contractor budget	# of sensitization measures for communities # 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
		• Restrict access to construction site through signage • 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 • Locked storage of hazardous materials			% of small openings that have been covered % of larger openings that have an escape opening # of locked storage for hazardous materials	
	Risk of traffic and road safety	• Safety/warning signage, safety barrier around the construction site, and safe driving practices () • Include traffic road safety into the daily toolbox talks • Emphasize safety aspects among drivers • Require licensing of drivers • Adopt limits for trip durations and arrange driver rosters to avoid overtiredness	Contractor	Inc in Contractor budget	# of signage # of toolbox talks that include road safety issues % of drivers that are properly licensed # of Driver rosters # 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
		• Preassign routes for project traffic • Regular maintenance of vehicles to minimize potential for accidents.				
	Impacts of dust, air pollution and noise generation	• High level maintenance of the vehicles to reduce the vibrations • Selecting equipment with lower sound power levels • Installing suitable mufflers on engine exhausts and compressor components • equipment casing • 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. • Suitable wet suppression techniques need to be utilized in all exposed areas	Contractor	Inc in Contractor budget	% of vehicles well maintained % of engine exhausts with mufflers installed % 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
		- All unnecessary traffic must be strictly limited on site speed controls are to be enforced - Monitor exhaust emissions to ambient air, waste pollutant releases to land and water.				
Operational Phase						
	Road traffic safety risk ¹⁹ s and increased noise level from increase in traffic	- Install signage for speed control in front of settlements - Safety/warning signage, safety barrier,	Local Authorities	Municipal budget	# of speed control signage # of safety/warning signs have been installed	throughout project implementation
ESS 10: Stakeholder Engagement and Information Disclosure						
ESS 10	Preparation and Construction Phase					
	Risks of poor access to beneficiaries lead to less meaningful community engagements and difficulty in monitoring for social harm	- Implementation of GRM - Monitoring of GRM solutions in a timely manner - Use site-specific incident logs	PIU	PIU GRM costs	% of complaints filed have been addressed # of site-specific incident logs	monthly

¹⁹ 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
		• Implement SEP				
	Risks of lack of information on access to GRM leads to lack of accountability	• Awareness raising on GRM	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	• Conduct in- depth community engagement, providing information on the sub project • Implement SEP	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 5 Institutional partners' responsibilities

Project Implementation Unit - PIU	The application of mitigation measures required under this ESMP is the 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. 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.
State Project Team - SPT	The SPT's Environmental & 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.
Ministry of Public Works (MoPW)	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.
District Commissioner	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 Commissioner will be specifically involved in facilitating stakeholder engagements, assisting the Contractor in the recruitment of local workers and ensuring the security to the Contractor's 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.
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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 6 below. A template for an Environmental and Social Monitoring report is included in Annex 3.

Table 6 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	Compliance status of the Project with the environmental and social mitigation and monitoring measures. The report should cover: • environmental incidents • health and safety incidents, • health and safety supervision: • Usage of PPEs by workers • highlights of inspection • Training conducted and workers participated • Workers grievances • Community grievances • Chance find (if any)	Monthly	Contractor/SPT
2	ESMP Monitoring Report to WB	Compliance status of overall Project with ESMP requirements	Quarterly	PIU
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. Detailed Investigation Report within ten days	PIU (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.

10. 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).²⁰

Initially the PIU and UNOPS Teams traveled to Luuq District in February / March 2021, for a joint assessment mission to identify flood-affected roads, among other infrastructures (see Appendix 1 for participants of consultations). During this field assessment mission, district and community level consultations were held in Luuq/Gedo Region. Key issues consulted on included plans of the sub-projects needs in terms of projects, potential environmental and social risks of the identified projects and planned mitigation measures, and investment sustainability, as well as information dissemination of GRM.

District Level Consultations: On March 3, 2021, the field assessment team met with the local government officials and community leaders in Gedo Region/Luuq District. The meeting was attended by the Governor of Gedo Region, the Luuq District Commissioner, the Mayor, Security Chiefs, Flood Protection Committee members, officials from various Ministries, youth and women's representatives, community elders, business people and religious leaders.

The district administration stated that Luuq is one of the districts affected by floods in Somalia and significant amounts of its infrastructure - including roads, hospitals, houses and schools - were destroyed by recurrent floods, caused by the over-flowing of the river.

Participants in the meeting articulated their immediate priority needs as follows:

1. Flood Risk Management
2. Rehabilitation of roads
3. Rehabilitation and construction of health facilities
4. Rehabilitation of the water infrastructure

On 24 February, Community consultations: The team met with elders of the local flood-affected communities, who informed the team that Luuq is a district destroyed by recurrent floods and has been affected by recurrent floods for many years. They stated that NGOs operating in the area do not play their role efficiently and are incapable of addressing these recurrent floods and affects.

On 24 February, the team further met with representatives of the agro-pastoralist communities, who informed the team that every time floods occur, their farms and crops are destroyed, which affects livelihoods of many in Luuq, they also stated that the farming equipment is affected by the floods and the roads that lead from and to the farms and to the city – which are crucial to transport crops and vegetables to the city in order to be able to sell the produce - become severely flooded. They identified road rehabilitation as one of their priorities.

Members of the women's association of Luuq stated that recurrent floods flooded the roads in and out of town. This affects transportation of goods, but also pedestrians (such as mothers and daily livelihood seekers) in a devastating way. Given flood impacts on the road system, when women go into labor, there are often no means of access to the hospitals, which puts many women and un-born babies at risk.

²⁰ 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>

Representatives of the youth community in Luuq stated that recurrent floods in the district have caused their employment to be halted, which has affected their and their family's livelihoods severely. They told the teams that whenever severe flooding occurs they are displaced from their villages and neighborhoods until the water eventually dries up, which can take up to 3 months. The youth representatives requested that canals be built around the river to help the stream of water and the creation of cash-for-work for the youth when construction takes place.

Representatives of the IDP community and vulnerable communities in Luuq district / Gedo Region, who mostly have fled from local level conflicts, and have been seeking safe haven in the district, were displaced again when severe flooding occurred, as their temporary shelters in camps were completely destroyed. They stated that there was no assistance in Luuq and when they are displaced, there is no access to health care – however insufficient it may be. They also stated that wells have been affected by floods and outbreaks have happened, previously such as cholera which devastates vulnerable communities who don't have access to sufficient medical care.

Figure 17 Consultations 24 February in Luuq



11. 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.²¹ 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'.²² 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. For further details, refer to the GRM Manual.

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). It also operates in addition to specific workers' grievance redress mechanisms, which are laid out in the LMP (the LMP is an annex 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.

²¹ Under ESS 2 (Labor and Working Conditions), a grievance mechanism for all direct or contracted workers is prescribed, which will be laid out in a separate Labor Management Plan (LMP). 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.

²² World Bank, Environmental and Social Framework, 2018, p. 131.

11. Implementation Budget

Table 7 Estimated Costs

	Required Resources	Costs in USD
PIU – Monitoring of ESMP		
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
Grievance Redress Mechanism hotline		
7.	Hotline and other mechanisms	PIU GRM budget
8.	GBV/SEAH reporting mechanisms	PIU staff costs
Implementation of Risk Mitigation Measures Contractor		
9.	Human Resources 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 +tdb
	TOTAL	27 000

Table 8 Implementation Budget

12. CONCLUSIONS

The Luuq Roads rehabilitation proposed under Component 2 of the SCRP is well supported by the Government stakeholders and the local communities. The rehabilitated roads are 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 activities associated with the rehabilitation of the Luuq Roads are also likely to generate site-specific risks and adverse impacts. Most of these are related to typical risks and impacts associated with 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. Luuq roads have no land and resettlement issues or no issues of economic impact for roadside vendors, confirmed by the detailed engineering survey carried out as part of the road design.

The ESMP was prepared to help mitigate potential environmental and social risks and impacts. The risks and impacts for Luuq 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 SCRP E&S instruments, World Bank Environmental and Social Standards (ESSs) and local legislation.

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- The World Bank Group, Environmental, Health and Safety Guidelines

The World Bank, Environmental and Social Framework, 2018

The World Bank Good Practice Note on 'Addressing Gender Based Violence in Investment Project Financing involving Major Civil Works'

WB Good Practice Note on Road Safety, accessed at:
<https://thedocs.worldbank.org/en/doc/648681570135612401-0290022019/original/GoodPracticeNoteRoadSafety.pdf>

Annex 1: Community Consultations

Table 9 Participants in Field Mission Bardhere / Luuq

Jamhuuriyadda Fe`deraalka Soomaaliya
Wasaaradda Maaliyadda
Mashruuca ka soo kabashada Xasaradaha Ee Soomaliya



جمهورية الصومال الفيدرالية
وزارة المالية
مشروع إنعاش الأزمات في الصومال

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

Date: 16 February 2021

Subject: Attendance Sheet Field Mission Berdere

No	Name	Title	Telephone
1	Ahmed Xiish Carta	Deputy District Commissioner	0617775005
2	Mohamud Ibrahim Salaad	Director of Social affairs	0615223415
3	Ahmed Adan Ibrahim	Security Chief District	0618563881
4	Sacid Abshir Cartan	Coordinator of Farm	0611011111
5	Mohamed Xaaji	Second Deputy of Commissioner	0616891000
6	Abdiqadir Adan Osman	Head of Projects District	0612202209
7	G/L Abdi sheikh Hassan Elmi	Station Commander	0619930200
8	Zakira Ayub Mohamed	DMO Berdere	0617775040
9	Adam Shaif Abdi	IDPs	0615657788
10	Ismail Omar Mohamed	Director of IDPs	0615811780
11	Muhumad Cadow Cabdile	IDPS	0617133353
12	Farah Hirsi Guhad	DDR	0615550730
13	Sheikh Farhan Mohamed	Director of Religious	0615812970
14	Siyad Dhaqane Muhumed	Religious leader	0615812936
15	Adan Rukow Abdi	Village Commissioner (Horseed)	0617555031
16	Hussein Adan Warsame	Community elders and clan chiefs	0615812912
17	Dhaqane Abdullahi Mohamed	Community elder	0615833421
18	Hassan Ali Hassan	Village Commissioner (Buula Geedi)	0612555847

19	Ibrahim Mohamed Omar	Village Commissioner (Masawa)	0618987063
20	Dahar Rashid Sahal	Director of Youth	0619991213
21	Shire Abdirisak Mohamed	IDPs	0617776956
22	Ibrahim Hassan Wardhere	Religious leader	0616409170
23	Siraji Mohamed Bashir	Youth	0613309694
24	Qaadid Abdi Mohamed	IDPs	0615162638
25	Mohamed Muhamed Ali	Community elder	0616990801
26	Mohamed Adan Macalin	Farmer	0612600300
27	Adan Farah Ali	Water Chairman	0612774422
29	Ibrahim Sheikh Hussein Muse	Farmers Chairman	0516669633
30	Bahsir Nor Ahmed	Business Chairman	0619060999
31	Barre Shuriye Garad	Youth	0618975427
32	Nor Shire Omar		0615706640
33	Mohamed Muhamed Ali	Community Elder	0616990801
34	Quresho Adan Omar	Chairwoman Women's organization	0615831840
35	Mohamed Ibrahim Macuush	Community Elder	0615393366
36	Abdi Bile Baldos	Community Elder	0617555412
37	Mukhtar Abdi Hassan	Youth	0617555880
38	Abdiqani Muse	Stakeholder Engagement, PIU	0618303838
39	Adan Abdi Adan	Senior Project Coordinator , UNOPS	0615918230
40	Eng. Khalid Mohamed	Civil Engineer, UNOPS	0615764977
41	Eng. Abdinur Farah	Project Engineer, PIU	0617895176
42	Eng. Mohamed Mohamud	Civil Engineer, UNOPS	0612186799

Annex 2: GRM

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 10 Types of Complaints expected

Categories of Grievances
1. Basic information
- Access to information
- Correction and deletion of untrue or misleading information that affects the person
2. Ethics and conduct
- Government entities and staff
- Implementing Partner staff
4. Violation and breach of codes of ethics
- 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
5. Violation of human rights and fundamental freedoms
- 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
6. Corruption and Economic crimes
- Unethical conduct
7. Labor and working conditions
- Termination/Summary Dismissal,
- Breach of Employment Contract Terms
- Conflicts with Trade Unions
- Work Injury
- Discrimination

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

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.²³ 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 regards 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.

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.

²³ The help desk must be budgeted by the IP, the manning of the help desk will depend on the nature of the activity

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 11 GRM Actions

Grievance Category	Required Action
Queries, comments and suggestions	Acknowledgement / Clarification
Complaints and concerns which do not require formal investigation	Grievances should be handled and resolved by the immediate manager within the GRM structure, e.g. the GRM Focal Point or a dedicated staff. 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.
Complaints and concerns that involve allegations that require investigation or interventions of a different kind	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... 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.

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 12 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 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 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 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 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 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 present 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 13 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: 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 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 Protocols

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.