

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 Hudur Main Road and Blimaqsi Road
Hudur District
South West State

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Project Implementation Unit (PIU)
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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
EHS	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
SCR	Somalia Crisis Recovery Project
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment
SMP	Security Management Plan
SPT	State Project Team
SWALIM	Somalia Water and Land Information Management
SWS	South West State
UN	United Nations

UNDP	United Nations Development Programme
UNICEF	United Nations' Children Fund
UNFPA	United Nations Population Fund
WB	The World Bank
WMP	Waste Management Plan

Executive Summary

The proposed Project aims to rehabilitate parts of Hudur Main Road (2.45 km) and Blimaqasi Road (3.9 km) in Hudur District, South West State. Hudur main road is a segment of the interstate road connecting Hudur to other towns in the South West State. This is a main supply road into the town from the farmlands and settlements on the outskirts of town and gives critical access to markets schools and hospitals. Blimaqasi road starts from town and runs Eastwards. It forms part of the road connecting to Beledweyne and Bulobarde. This road gives access to farmlands, villages and IDPs residing along the road.

The proposed rehabilitation will include: scarification of the existing road up to 150mm and compact it to form the subgrade. This will be followed by a 150mm layer of improved subgrade, a 200mm layer of gravel base and 150mm gravel wearing course.

For drainage, trapezoidal side drains and cross pipe culverts are proposed at low lying points. Both roads cross flood plains and are often impassable during the rainy season. A series of cross culverts is proposed at these locations.

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 the selected roads in Hudur. 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.

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.

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 activities associated with the rehabilitation of the Hudur Roads will likely generate adverse site-specific risks and impacts. Most of these are related to typical risks and impacts in civil works,

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

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. Workers will be able to raise their grievances through a dedicated mechanism, where contractors provide such.

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 SCRPP. 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 the selected Hudur 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 Hudur Roads have been selected in consultation with the State and local government partners, community stakeholders and 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 the selected Hudur 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 relevant WB's ESSs & WBG General Environmental, Health and Safety Guidelines (EHSGs).

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 labour 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_CEN-SADIGAD_English.pdf

2. Policy and Legal Framework

2.1 National Regulatory and Policy Framework

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

In recent years the Federal Republic of Somalia and its Federal Member States (FMS) have effected constitutional changes that define natural resources, common environmental goods and ecosystem services as protectable public assets, and ascertain the right to a clean and healthy environment. However, there are no specific environmental or 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 Civil Society Organizations (CSO) and Community-Based Organizations (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.

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 (2019) promotes the use of appropriate environmental assessment instruments. However, the implementation of this policy has not been rolled out in South West State.

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

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

policies and legislation, including establishing of the Environmental Quality Standards, and Sectoral Environmental Assessments, Environmental Impact Assessments (EIA). Laws on environmental governance in South West State are at infancy stages and environmental impact assessment capacity is nascent. Environmental decision-making arrangements includes the FGS signing international conventions, and parliament approving Environmental Acts and Laws. However, necessary laws have not been formulated yet.

2.2 International Conventions Signed and Ratified by Somalia

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

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

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

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

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

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

2.3 World Bank Environmental and Social Standards (ESS)

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

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.

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

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.

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.

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

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

ESS 10 – Stakeholder Engagement and Information Disclosure. This ESS recognizes the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation. Stakeholder engagement has been undertaken for this sub-project, as listed

below (see Section on Stakeholder Engagement). In consideration of Covid-19 restrictions, the project has followed World Bank guidelines on community consultation under COVID-19⁷.

2.4. WBG Environmental, Health and Safety (EHS) Guidelines and Technical Notes

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

⁷ The World Bank, Citizen Engagement and Stakeholder Consultations during COVID-19, accessed at: <https://www.worldbank.org/en/news/factsheet/2020/12/01/citizen-engagement-and-stakeholder-consultations-during-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. To utilize national environmental and social institutions, systems, laws, regulations and procedures in the	<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. The National Environmental Policy (2019) promotes the use of appropriate environmental assessment instruments. It mentions EIAs as systematic examination to determine whether a project will have adverse impacts. It is applicable for all projects with significant effects on the environment.	Laws have not been developed yet ESIAs not incorporated in federal law yet, and not strong in State-level legislation The policy is not implemented	An E&S Screening process has been followed for this sub-project in order to assess whether activities require environmental and social assessments, and this ESMP has been prepared.

ESF Objectives	National Laws and Requirements	Gaps	Recommended Actions
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 Human trafficking: A person may not be subjected to slavery, servitude, trafficking or force labour offences. Every labour law shall comply with gender equality. Dismissal for pregnancy. All women have a special right of protection from discrimination.	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	The Project does not allow any forced and child labor. It will hold all contractors liable to the implementation of the LMP The PIU will have overall responsibility to monitor the implementation of the LMP The LMP spells out a workers' grievance redress mechanism; and the GBV Action Plan provides referral pathways for cases of GB

ESF Objectives	National Laws and Requirements	Gaps	Recommended Actions
	<u>The Labour Code of 1972</u> stipulates that all contracts of employment must include a) the nature and duration of the contract; b) the hours and place of work; c) the remuneration payable to the worker; and c) the procedure for suspension or termination of contract. Furthermore, all contracts must be submitted to the competent labor inspector for pre-approval.	n/a	The Project will fully comply with WB ESS 2. This is set out in the LMP
	<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 Project 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

ESF Objectives	National Laws and Requirements	Gaps	Recommended Actions
	The Labour Code of 1972. Remuneration must be adequate in view of the quality and quantity of the work delivered, and must be non-discriminatory in regards to age, gender and other aspects. Maximum number of working hours per week are 8 hours per day and 6 days per week.	Women are restricted from being employed in night work, and the specific types of work prohibited for women may be prescribed by decree. No provisions on the protection of the rights of domestic workers	The Project will fully comply with the national law and WB ESS 2. This is set out in the LMP and this ESMP
	The Labour Code of 1972. 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 – in all project worker categories – from the age of 18 (see LMP). Rigorous monitoring will ensure the application of the LMP.
	The Labour Code of 1972. 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.	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 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.
	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	n/a	The project will follow national legislation and ESS 2.

ESF Objectives	National Laws and Requirements	Gaps	Recommended Actions
	freedom of association. Workers are allowed to join trade union.		
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.	Provisional Constitution of the Federal Republic of Somalia. Somalia passed its Provisional Constitution in 2012. Article 12 of the Constitution addresses public assets and natural resources. The Environmental Policy (2016) is based on a 'polluter-pays' principle. It further defines that the government's role in pollution prevention and waste management.	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
	Provisional Constitution of the Federal Republic of Somalia. 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		

ESF Objectives	National Laws and Requirements	Gaps	Recommended Actions
	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 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 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		

ESF Objectives	National Laws and Requirements	Gaps	Recommended Actions
	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 relating to climate change, in the design and construction of infrastructure, including dams	<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 commission of an offence both the perpetrator and his superior will be liable	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.
	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

ESF Objectives	National Laws and Requirements	Gaps	Recommended Actions
			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: Land Acquisition, Restrictions on Land Use and 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 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	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) 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. ESS 5 further defines types of losses to be compensated to include physical and economic displacements and cover land,	Where land is donated by private owners, a land donation agreement process is implemented. A Resettlement Policy Framework (RPF) (accessed at: https://mof.gov.so/sites/default/files/2020-08/Resettlement%20Framework%20Somalia%20Crisis%20Recovery%20Project%20%28P173315%29.pdf) guides the development of site-specific RAPs
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	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.	residential or commercial structures, and lost income caused by temporary or permanent economic displacement While under Article 26 of the Agricultural Land Law, 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. The Agricultural Land Law does not determine compensation schedule and cut-off date. ESS 5 determines that improvements of the living situations of displaced vulnerable people should be undertaken. No Somali Law provides 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.	
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ESF Objectives	National Laws and Requirements	Gaps	Recommended Actions
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. 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.	<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, based on the Project Stakeholder Consultation Plan (SEP)⁸ The SCRP GRM is implemented in the sub-project area

⁸ Government of Somalila, Somalia Crisis Recovery Project, Stakeholder Engagement Plan (SEP), 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>

3. Biophysical and Socio-Economic Environment

This section describes the overall baseline condition of Hudur District in SWS in regard to the biophysical environment, as well as the socio-economic background of the sub-project area. The biophysical environment of the district is in principle similar to that generally in Somalia, with minor variations.

3.1 Proposed Project Location

The proposed project is located in Hudur town, in the north of Somalia's South West State (SWS). Hudur lies approximately 420 km southwest of Mogadishu. Hudur town is the center of Hudur District. And Hudur District is part of the southwestern Bakool region.

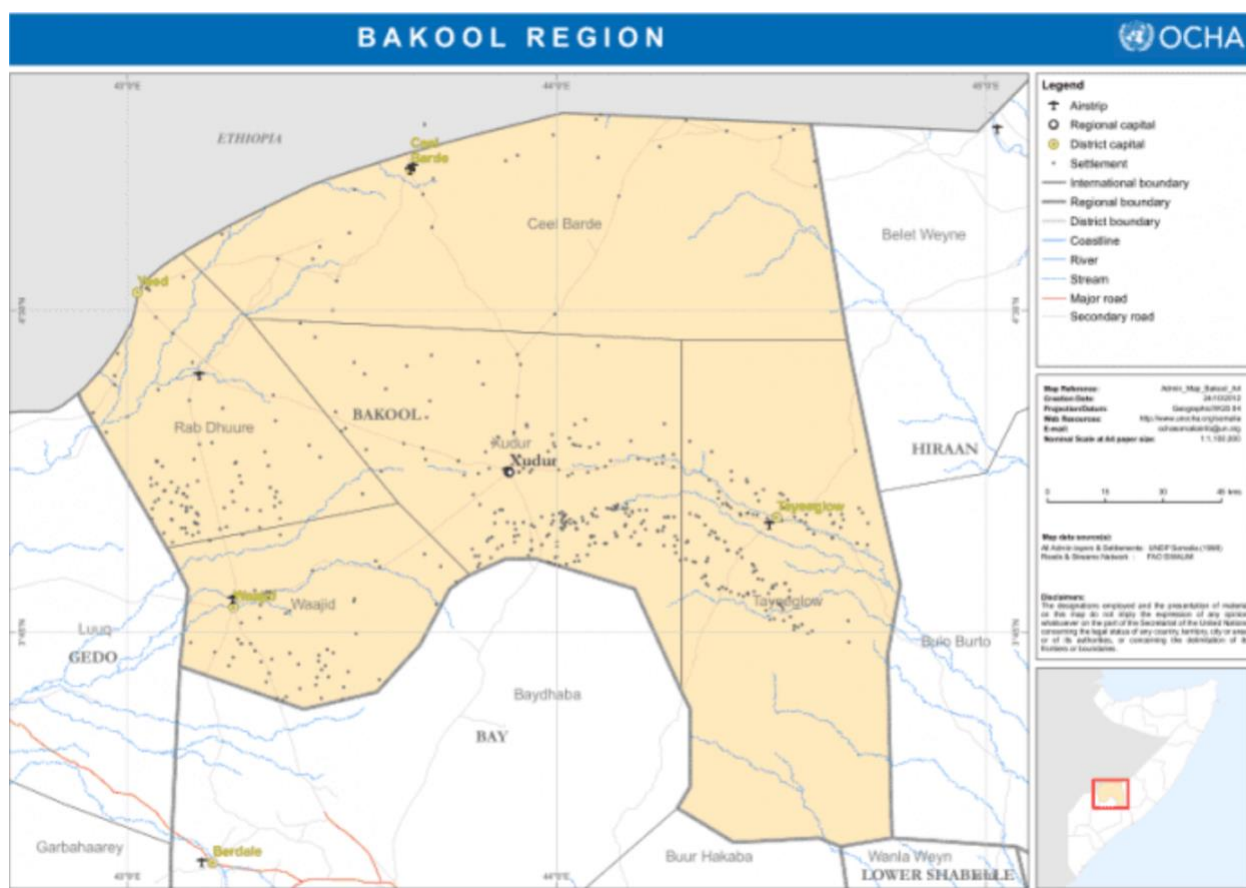


Figure 3.1 Map of Bakool Region with Hudur (Xudur), OCHA

Below map shows the Hudur roads layout with Hudur Main Road and Bilimaqsi Road highlighted.

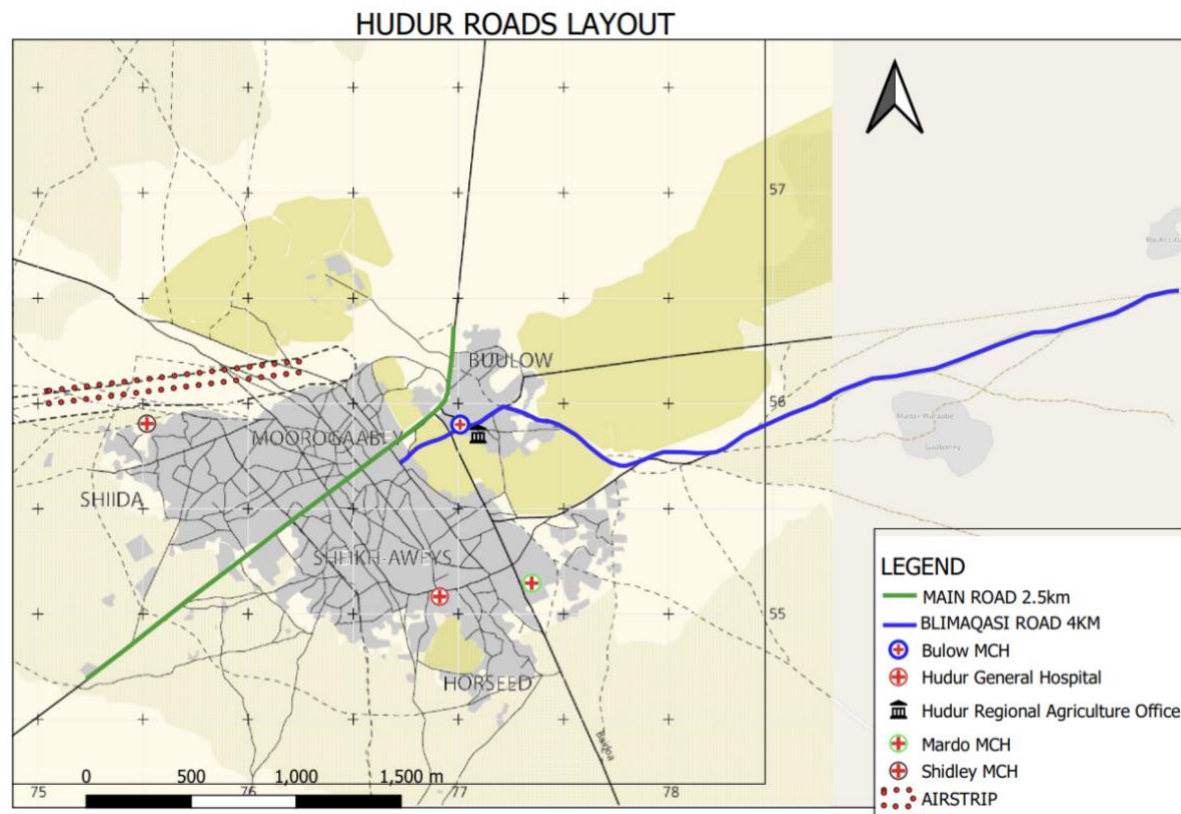


Figure 3.2 Hudur Roads Layout

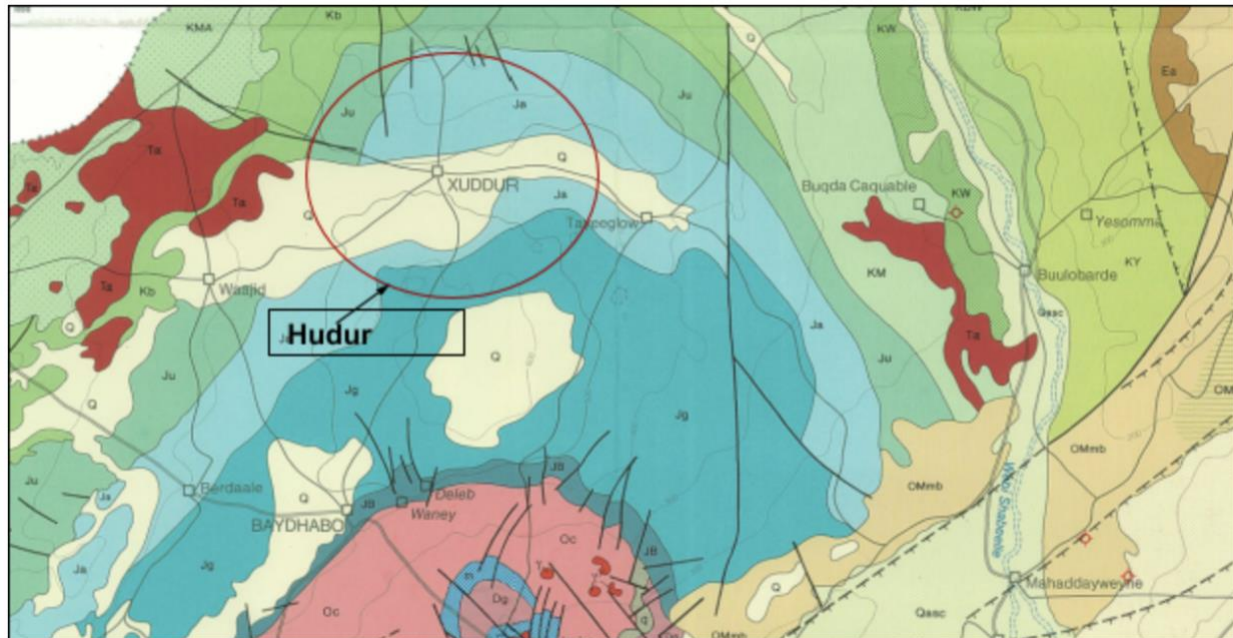
3.2 Physical Environment

Topography: Hudur District, in which the MCH is located, is located in the Bakool region. Minimum elevation is 105 meters, and maximum 1,099 meter.



Figure 3.3 Topography and vegetation of Hudur

Geology and Soil: The general soil conditions within Hudur town is silty sand and clay near the river banks. The town sits on a hard pan of calciferous material. However, there are low lying areas sections with clay soil and red alluvial soils. The regional geology of the Hudur area comprises of silts, sands and gravels of colluvial, alluvial and aeolian origin overlying limestone rock. An extract of the geological map of the area is shown in the Figure below.



KEY:

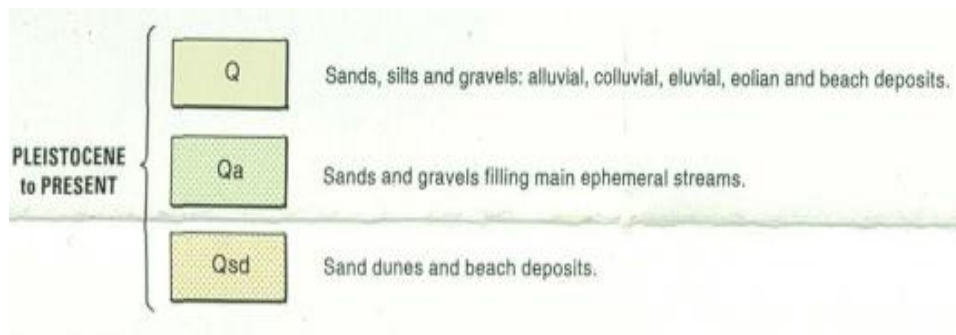


Figure 3.4 Geological Map of southwest Somalia

Hudur town lies in the Uegit formation, sandwiched between the Ambar sandstone formation to the west and the Baidoa formation to the east. Its thickness is about 350m, the rocks are limestones of calcareo-psephitic and calcareo-pelitic, with Oolitic beds and some pisolithic and coquina beds. The depositional environment varies from mesoneritic to littoral.

Climate: Hudur lies 500 meters above sea level, and its climate is mostly hot and dry during the year, with erratic and unreliable rains – a bi-modal climate pattern that is typical in semi-arid areas.

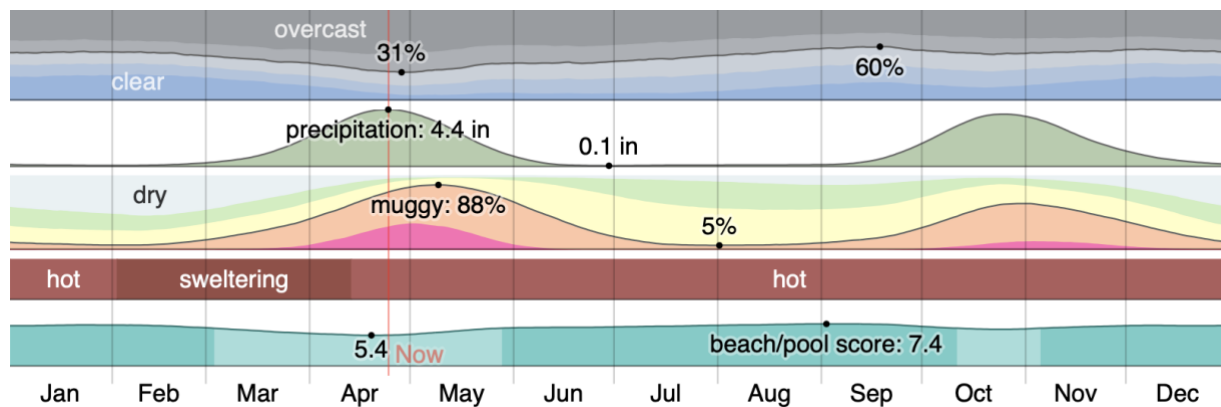


Figure 3.5 Climate in Hudur District

The hot season lasts from February to April, with an average of 36°C during the day in February and March and 22-23 °C during the night. The cool season peaks in Jul with an average of 29°C during the day and 21 °C during the night.

The annual amount of rainfall in Bakool region ranges between 300-350 mm, 2/3 of which usually precipitates during the primary rainy season of Gu (April-June). The rest of the rainfall occurs during the season of Deyr (October to November). In recent years a notable change has taken place and the region has received more rainfall during the Deyr than it has during Gu. Ideally the primary Gu season should be avoided for construction works, however, given the duration of sub-project preparation it is difficult to set a specific date for the works.

Hudur, Somalia Weather Averages

Month	Day	Night	Rain Days
January	34°C	21°C	0
February	36°C	22°C	0
March	36°C	23°C	2
April	33°C	23°C	12
May	31°C	22°C	8
June	30°C	21°C	1
July	29°C	21°C	0
August	30°C	21°C	1
September	31°C	21°C	1
October	31°C	22°C	10
November	31°C	22°C	7
December	33°C	21°C	1

Figure 3.6 Hudur monthly average temperatures⁹

Figure 3.7 Annual Maximum 24-hour rainfall series at Huddur station (located in close proximity to the roads, ca. 5 km)

Year	Huddur Station Location Ref. 4.16667 N, 43.9 E (approximately 5km from Project Roads)	
	max. 24hr rainfall (mm)	Annual rainfall (mm)
2005	61	175.5
2006	50	645.5
2007	43	261.5
2008	111	475

⁹ World Weather Online, Hudur Climate Weather Averages. Accessed at: <https://www.worldweatheronline.com/hudur-weather-averages/bakool/so.aspx>

Year	Huddur Station Location Ref. 4.16667 N, 43.9 E (approximately 5km from Project Roads)	
	max. 24hr rainfall (mm)	Annual rainfall (mm)
2009	39	166.5
2010	40	238.5
2011	57	392.5
2012	85	453
2013	40	372.5
2014	68	439
2015	16	65
2016	75	391
2017	82	314.5
2018	65	486.5
2019	78	577.4
2020	70	570

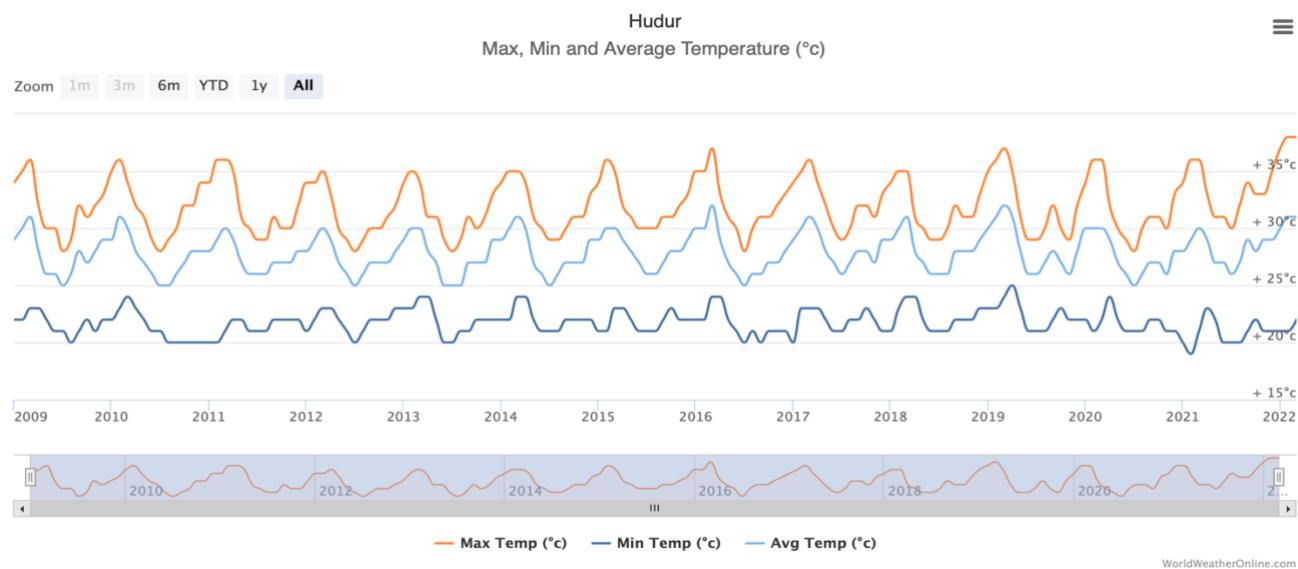


Figure 3.8 Max, Min and Average Temperature in Hudur¹⁰

¹⁰ World Weather Online, Hudur, accessed at: <https://www.worldweatheronline.com/hudur-weather-averages/bakool/so.aspx>

Water Resources and Hydrology: The Bakool region does not belong to the two perennial rivers. The topography of the region is set up in a way that it collects water within two main watersheds that form a narrow strip of more fertile land between Hudur and Tayeeglow.¹¹

A hydrological study was carried out by means of desktop reviews of available data and site visits to the project area. The outcome of these studies including a full description of the catchment areas are summarised below:

Hudur has reliable water resources throughout the year, as explained above. However, the morphology of the terrain makes the areas particularly inclined to flash floods. The green areas (marked blue in the below map) between Buulow and the other villages of Hudur town are usually at risk. In some cases villages can become isolated for days through floods.

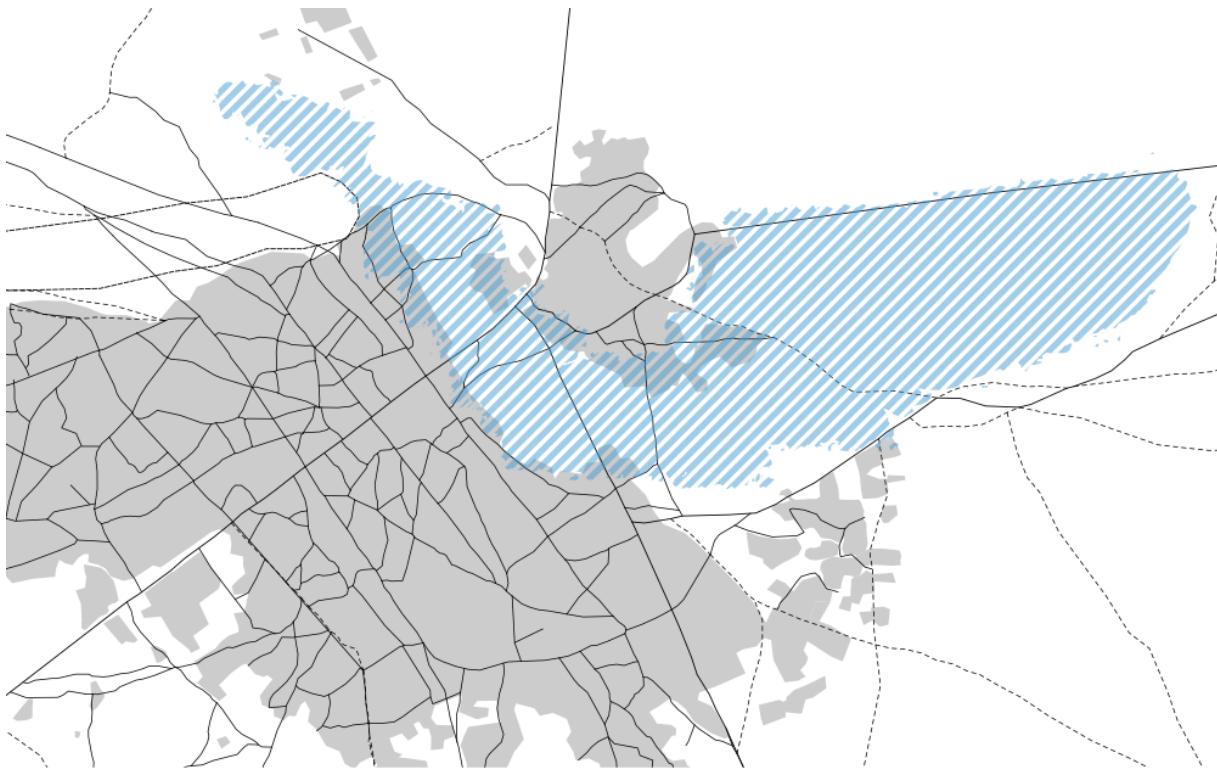


Figure 3.9 Hudur flood-prone areas¹²

The project area lies within the Shabelle basin. There are no major rivers near the project area, with the surface drainage being through gullies and floodplains. The general slope of the land is from the North West to the North East direction. There is a floodplain that cuts through the town forming the largest drainageway through the project area. The catchment has an approximate

¹¹ IOM, UN Habitat, Hudur – Urban Profile, working paper 2018, p, 10, accessed at: <https://reliefweb.int/sites/reliefweb.int/files/resources/Xudur%20City%20Profile.pdf>

¹² IOM, UN Habitat, Hudur – Urban Profile, working paper 2018, p, 13, accessed at: <https://reliefweb.int/sites/reliefweb.int/files/resources/Xudur%20City%20Profile.pdf>

area of 42 km² and slopes from North West to North East direction. The upper areas of the catchment consist of gullies which transition to a flood plain near Hudur town.

The average slope percentage of the catchment area of the project area is 2.34%, which can be termed as moderate based on the TRRL classification presented below:

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

The catchments areas intersecting the project roads are shown in the Figure below.

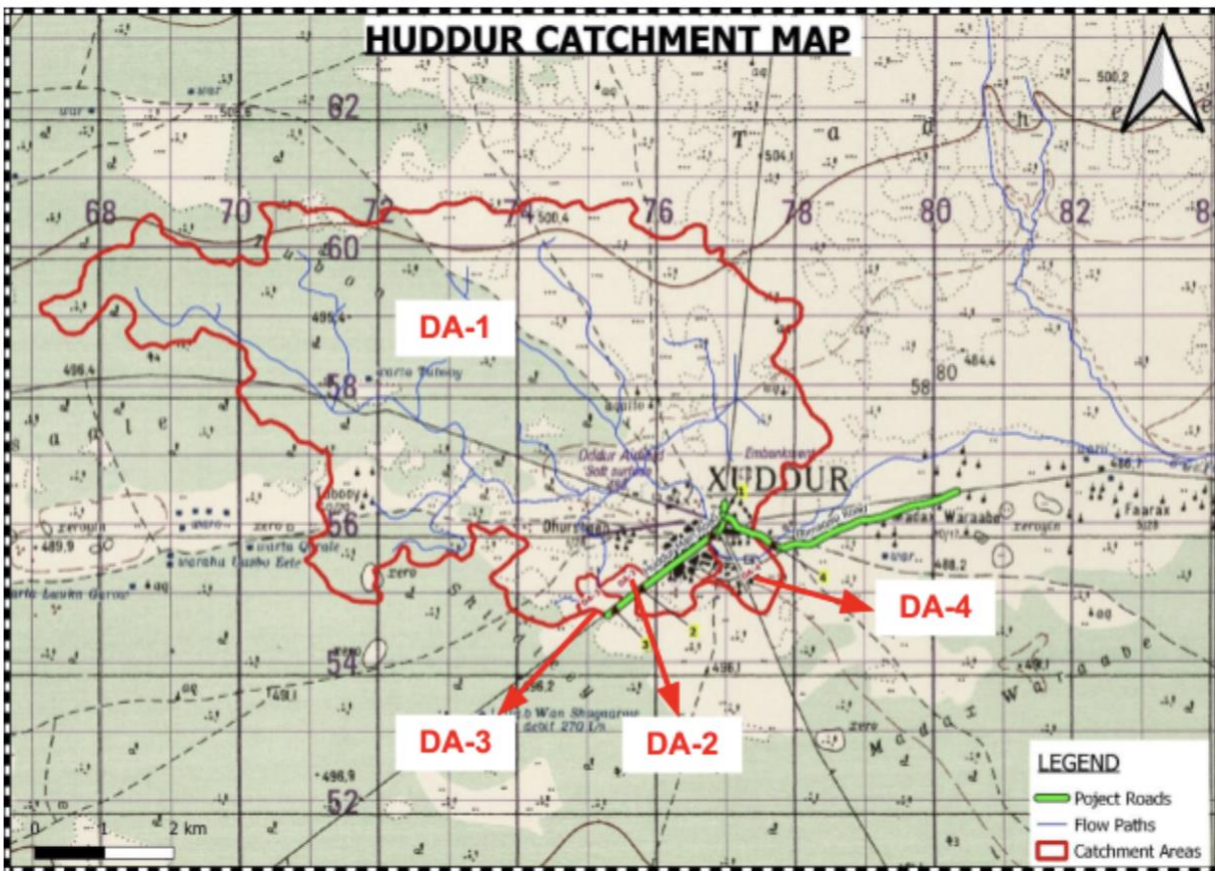


Figure 3.10 Topographical map of the road area with catchment boundaries.

For each catchment, the area, slope, length of the longest stream and slopes of the longest stream have been extracted and presented below;

No.	Catchment	Road Name	Road Station (km+m)	Catchment Area (km ²)	Length of longest stream (km)	Slope of longest Stream (m/m)
1	DA-1	Huddur Main Road	0+520	41.11	11.25	0.04
2	DA-2	Huddur Main Road	1+710	0.22	0.55	0.01

No.	Catchment	Road Name	Road Station (km+m)	Catchment Area (km ²)	Length of longest stream (km)	Slope of longest Stream (m/m)
3	DA-3	Huddur Main Road	2+240	0.62	0.62	0.01
4	DA-4	Blimaqasi Road	0+790	41.78	12.26	0.03

Figure 3.11: Catchment characteristics

There is a wellfield east of the Hudur airstrip, which acts as a drinking point for livestock. In addition, the wellfield presents one of the most reliable sources of water for the town as it does not dry up during drought seasons. This could be attributed to the floodplain, which slows the runoff and allows for infiltration, thus recharging the wells that lie in it.

3.2. Socio-economic Environment

Population:

Figure 3.12 Population profile of Gedo region

Region	Urban	Rural	Nomads	IDPs *	Total
Bakool region	62,000	134,000	147,000	24,000	367,000

*Source: UNFPA 2014

The dominant clan in Hudur town is the Hathama clan (Rawaweyn – Digil Mirifle). 3% of Somali live in Hudur town, which has a low urbanization rate. The urban population rate in Hudur town, for example, has remained constant between 2005 and 2014, with app. 19,000 people. The urban built-up area has similarly not increased. UN Habitat estimates that Hudur may have a population of 32,000 in 2025.¹³

Livelihoods: The communities of Hudur District are agro-pastoralists, as Hudur is characterized by a mixture of pasture and rangeland, which is suitable for livestock grazing and marginal farming. The southern part of the District is identified as Low Potential Agro-pastoral Livelihood Zone, whereas the northern part is mainly arid and mostly pastoral. People have therefore settled along the Hudur-Tayeeglow axis and in the south of the district. But even where cultivation takes place, there is poor soil fertility, high salinity, low moisture retention and a low yield. Human activity has caused the land to be degraded and vegetation to be lost – due to human pressure on land resources.¹⁴

Livestock rearing and farming engages more than 80% of the local populations. Farming is practiced seasonally as the weather conditions may change. Farming produce mainly includes cereals (maize and sorghum), beans, simsim, fruits and vegetables such as pawpaw, tomatoes, watermelon, onions and pumpkins.

¹³ IOM, UN Habitat, Hudur – Urban Profile, working paper 2018, p, 10, accessed at: <https://reliefweb.int/sites/reliefweb.int/files/resources/Xudur%20City%20Profile.pdf>

¹⁴ IOM, UN Habitat, Hudur – Urban Profile, working paper 2018, p, 13, accessed at: <https://reliefweb.int/sites/reliefweb.int/files/resources/Xudur%20City%20Profile.pdf>

Suuq Weyne is the main market in town, it is centrally located and has a modern structure. Furthermore, Hudur has a livestock market, as well as small-scale businesses and menial labor jobs.

Hudur's economy is significantly affected by the fact that it is largely surrounded by Al-Shabaab, which controls the main access routes into town and charges taxes on goods being brought in.

Administration and Governance: Hudur town consists of five villages, which is each chaired by a village leader and committee members: Buulow, Moorogaabey, Sheik-aweys, Horseed, Shiida. The main road passes through the centre of Hudur town. Sheik-aweys and Horseed villages are to the south of the main road, while Moorogaabey and Shiidle villages are to the north. Blimaqasi Road passes through Boolow Village (East).

Hudur has a local district council with 27 members, the council was elected. Previously, in 1999 Al-Shabaab had seized the town and controlled it until 2014, when Ethiopian troops and AMISOM forces re-captured it. It has since been under control of the Federal Government.

Health and Education: The entire district only has 4 primary schools, which is not sufficient to service all age-relevant children. The Hudur Primary School included services to children from the 18 IDP camps in Hudur. Two of the primary schools also provide secondary school education, the Hudur Primary and Secondary School and the Shodog Primary and Secondary School. Hudur also has a university, Hudur University. In view of health services, Hudur has the HUdur Imc Maternal and Child Health Center, the Huddur General Hospital, the Shiidle Health Center, and the Ramadan Health Center.

Road Infrastructure: The town traffic is mainly comprised of Rickshaws (Bajaj/tuk-tuk) and donkey carts. Some 4x4 vehicles, trucks, saloon cars are also present. At the time of the site visit, most vehicles were parked due to a fuel shortage. Donkey carts are mostly used for water transport around town and the rickshaws are used for passenger and good transport.

Hudur Main Road is a segment of the interstate road connecting Hudur to other towns in SWS. The road is from Wjiid in the southwest and runs through the town centre towards Elberde in the northwest. It is a main supply road into the town from the farmlands and settlements on the outskirts of town. It also gives access to markets, hospitals and schools.

The road is a gravel road with a road reserve width of at least 15m that has been damaged due to flooding occasioned by lack of drainage provisions. There are no side drains and cross drainage structures along the road. The wearing course has been washed out and some sections are rendered impassable / cut off during the flood season. The community has attempted to rehabilitate the damaged sections by dumping, spreading and compacting gravel by hand. However, these efforts have not been successful in averting the flooding after a rainfall event. The existing ground is rocky gravel except on the low-lying areas (flood area) where it is silty loam soil.



Figure 3.13 Photos of Hudur Main Road

Bilimaqsi Road is an earth road that starts from town and runs northwards. It forms part of the road to Beledweyn and Bulobarde. This road gives access to farmlands, villages and IDPs residing along the road. It is the most affected road by floods as it runs through a floodplain in Bulloow village. The first kilometer of the road runs through a flood plain where the soil type is clay alluvial soils. This section is impassable during the rainy/flood season. The in-situ material is not suitable for subgrade as it is soft and possibly expansive.

From the km1+000 the ground condition improves to stony gravel. The road has been eroded and is lower than the surrounding ground making it a drainage canal during rains when the flood plain overflows.



Figure 3.14 Photos of Bilimaqsi Road

There has been an intervention to ease movement on Hudur main road by raising the level of the road (embankment measured to be about 0.6m high), but there is no cross drainage structures

are provided, reportedly, due to lack of funds. This intervention has been unsuccessful as the section is still flooded during the rainy season.

There are also farms lined along the floodplain, which presents suitable farmlands due to deposition of silt and rehydration of the soils during the rainy season. Notably, the floodplain areas are generally green throughout the year and have the biggest trees. The flood plain has a very gentle slope. The slope between the section on Hudur main road and the one at Blimaqasi road is about 0.07%. There is no riparian reserve along the floodplain and no well-defined channel crossings.. From the interviews with the local community, the runoff water on the Huddur main road section appears to be still and rises depending on the rainfall intensity.

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

The two Hudur Roads meet criteria set out for C2 projects in the Project Appraisal Document (PAD) as explained below:

- The roads are damaged by local drainage flooding and impassable during the rainy seasons. The flooding is because they are not engineered and lack drainage infrastructure to keep them motorable in wet seasons.
- The inclusion of Hudur Roads under C2 support has been requested by the State and the local administrations and supported during the local community consultation process
- Hudur roads connects 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 to ensure sustainability
- There are no identified security issues and the section of the road proposed for rehabilitation is accessible for the rehabilitation works implantation
- Based on the initial environmental and social screening undertaken, no major challenges are anticipated in ensuring environmental compliance. Though temporary relocation of semi-permanent business stalls along the roads will be required, residents, small scall farmers and business owners in the town will benefit from improvement of the road. A resettlement action plan has been prepared separately to address this.
- The estimated cost of the rehabilitation works is within the available budget for C2 works in SWS.

4.2 Proposed Intervention

The proposed intervention will improve the road profile, road pavement and the surfacing, and the drainage provisions. Both roads will be constructed as gravel roads.

The proposed rehabilitation will include: scarification of the existing road up to 150mm and compact it to form the subgrade. This will be followed by a 150mm layer of improved subgrade, a 200mm layer of gravel base and 150mm gravel wearing course.

There are no major drainage channels – rivers, streams, and therefore no major drainage structures involved. Trapezoidal side drains and cross pipe culverts are proposed at low lying points. Both roads cross flood plains and are often impassable during the rainy season. A series of cross culverts is proposed at these locations. The culvert schedule below gives the details:

Figure 0.1 Culverts Schedule

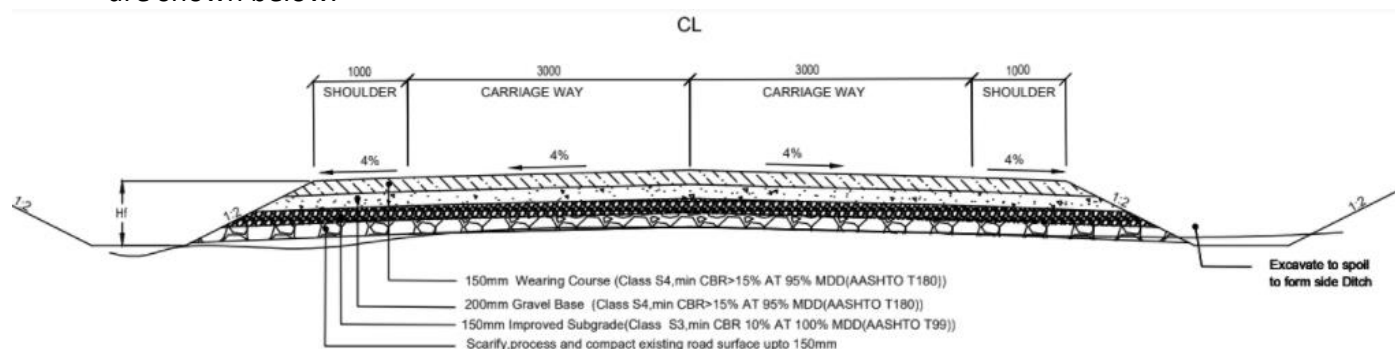
Crossing No.	Road Name	Approx. Location (km)	Structure Type	Height or Diameter (m)	No.	Remarks
1	Main Road	0+520	PC	0.90	24	24No. Ø900mm CPC
2	Main Road	1+710	PC	0.60	1	1 No. Ø600mm CPC
3	Main Road	2+240	PC	0.60	1	1 No. Ø600mm
4	Blimaqasi Road	0+790	PC	0.90	20	20No. Ø900mm CPC

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

4.3 Project Activities

Design Phase: The design phase included the following activities:

- Road condition assessment - A team comprising a Road Engineer and support staff conducted an assessment mission on identified roads and infrastructure in Hudur. The team visited Hudur 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.
- 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 has been carried out to improve the existing horizontal and vertical geometry while at the same time ensure that drainage of surface run-off is catered for. Road user safety and comfort has also been taken into consideration within the extent of the existing road alignment. The designed alignment follows the existing alignment. The designed pavement sections are shown below.



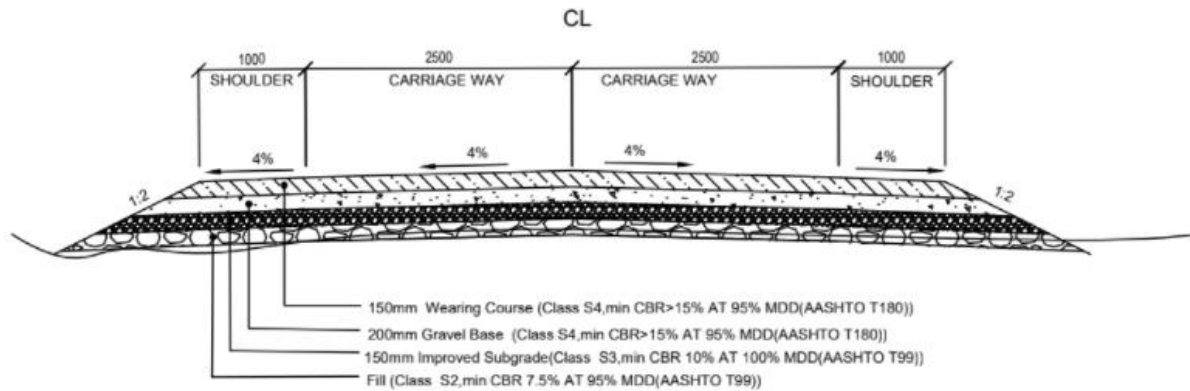


Figure 0.2 Cross Section Assignment Hudur Roads

- Design of drainage structures - The designed side drains of the roads are trapezoidal in shape with side slopes of 2H:1V. Hydrological analysis was performed on all the side ditches. The side ditches were designed to sufficiently channel run-off flows based on a 5-year return period. Pipe culverts have been designed to discharge the drainage water to the opposite side of the road, and then to the natural depressions. A typical cross-section of a culvert is shown below.

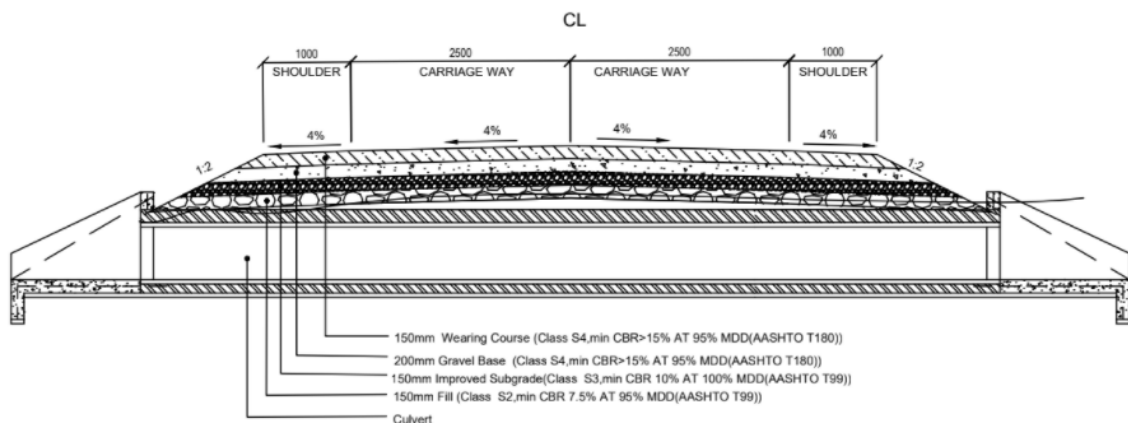


Figure 0.3 Typical cross-section of a cross-culvert

Construction Phase: The works to be executed under the contract comprise mainly, but are not limited to the following. The construction will not require a workers' camp as most workers will be recruited from the local community, and since the works are in proximity to the town where accommodation is available for external labor.

1. Construction of the contractor's camp which will consist of offices, sanitation facilities equipment maintenance yard, materials and tools stores,
2. Construction and maintenance of diversion roads, reconstruction of the existing roads, passage of traffic through the works and rendering all possible assistance to the public when passing through the diversions or main works (defined in the contractor's traffic management plan)
3. Construction of road side drains.

-
4. General Construction Work including but not limited to the following:
- i. Site Clearance of working area within the road reserve
 - ii. Topsoil stripping Stripped top soil will be used to cover embankment slopes for grass planting.
 - iii. Excavation and replacement of unsuitable material with suitable backfill material.
 - iv. Construction of the lower subgrade on widening, realignments and raised sections using suitable fill
 - v. Embankment protection works (gabions) and provision of longitudinal drainage ditches (lined and unlined)
 - vi. Construction/rehabilitation of pipe culverts, with appropriate inlet and outlet features and scour protection works
 - vii. Pavement Works and road furniture: Pavement works shall constitute but not limited to the following:
 - 150mm Wearing course
 - 200mm Gravel Base course
 - 150mm Improved Subgrade
 - Scarifying, processing and adding suitable material where necessary to form the lower subgrade
 - Any other operation ancillary to the main works
 - viii. Construction of cross drainage structures in the form of culverts
 - ix. Disposal of unsuitable material that cannot be incorporated into the works to a location approved by the project manager.

The following equipment will be used during construction:

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)	2
8.	Cat 950G Wheel Loader or Equivalent (2.9-4.4 m ³ bucket capacity).	1

The Contractor will be expected to deploy the following workers:

Item No.	Position/specialization	No.	Skilled / Unskilled
1.	Site Agent	1	Skilled
1.	Surveyor	1	Skilled
1.	Site Engineer	1	Skilled
1.	Environmental and Social Safeguards Specialist	1	Skilled
1.	Materials Technician	1	Skilled
1.	Construction Foreman – Earth Works and Pavement Layers (2 position)	2	Skilled
2.	Mechanic	1	Skilled
3.	Site Administrator	1	Skilled
4.	Casual labour	20	Unskilled

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.

One potential material site was identified and representative samples were subjected to laboratory testing to assess their suitability for use in pavement construction. However, the site has not been decided on, this will be done by the contractor.

5. Environmental and Social Risks and Impacts

This section lists the anticipated positive and adverse impacts associated with the Hudur Roads rehabilitation project.

5.1 Positive Impacts

- The rehabilitation of Hudur 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 road 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 Hudur 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, which consist of soil that is unsuitable for construction e.g black cotton soil,
- Sourcing of materials, an activity which may degrade the surrounding environment,
- Security for project operations including the protection of project workers and beneficiaries,
- 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.
 - Land and resettlement issues: 19 households have encroached on government land that was dedicated for road widening and need to give up 1-2 meters of the land they had encroached on; access to businesses may be impeded.
 - 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.

6. Environmental and Social Mitigation Measures and Monitoring Plan

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 2 Environmental & Social Management Plan: Rehabilitation of selected Hudur Roads

WB ESF	E&S Risks and Impacts	Mitigation Measures	Responsibility	Budget 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, community 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 District Security Risk Assessment	PIU / Contractor	Costs for security risk implementation	# District Security Risk Assessments # of Local Security Management Plans	Prior to commencement of activity

WB ESF	E&S Risks and Impacts	Mitigation Measures	Responsibility	Budget mitigation for (in USD)	Monitoring Indicator	Monitoring Frequency
		- 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 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 - 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	Contractor	Incl. in contractor budget	% of workers that have been provided with hearing protection # of equipment with vibration dampening pads or devices # of temporary shelters available # of trainings for industrial vehicle operators conducted % of heavy vehicle operators that have	monthly

WB ESF	E&S Risks and Impacts	Mitigation Measures	Responsibility	Budget mitigation (in USD)	Monitoring Indicator	Monitoring Frequency
		- 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 - Incorporate rest and stretching breaks into work processes and conduct job rotation - Implement quality control and maintenance programs that reduce unnecessary forces and exertions			been subjected to medical surveillance # of site speed limit signs at construction site # of rest and stretching breaks per work day	
	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 job announcements made to youth 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 recruitment and retention policies available % of workers that signed COCs	Monthly
	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 payments made on time # of workers' grievances filed # of GRM cases filed	Throughout project implementation

WB ESF	E&S Risks and Impacts	Mitigation Measures	Responsibility	Budget mitigation for (in USD)	Monitoring Indicator	Monitoring Frequency
					# of child and forced labor reported	
	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	Face masks and sanitizer available 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 - 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. R - Regular maintenance of vehicles and use of manufacturer approved parts to minimize potentially serious accidents caused by equipment malfunction.	Contractor		# of daily toolbox talk that include road safety talks # of accident reports # of register of vehicle maintenance	monthly

WB ESF	E&S Risks and Impacts	Mitigation Measures	Responsibility	Budget mitigation (in USD)	Monitoring Indicator	Monitoring Frequency
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 WBG General EHS Guidelines)¹⁵, such as: • Substitute raw materials or inputs with less hazardous or toxic materials • Institute good housekeeping and operating practices - including inventory control to reduce the amount waste • Institute procurement measures that recognise opportunities to return usable materials • Implement stringent waste segregation to prevent mixing hazardous and non-hazardous wastes • Identify potentially recyclable materials • Disposal at permitted facilities specially designed to receive waste	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 # of records of amount of solid waste disposed, where and when	monthly

¹⁵ 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 mitigation (in USD)	Monitoring Indicator	Monitoring Frequency
		• Provide on-site or off-site transportation of waste to prevent or minimize spills, releases and exposure to employees and public • 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				
	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. • 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.	Contractor	5,000 USD	# of water closet toilet facilities available % of toilets leaking Toilets are well maintained # of latrines provided % of latrines filled	monthly

WB ESF	E&S Risks and Impacts	Mitigation Measures	Responsibility	Budget mitigation (in USD)	Monitoring Indicator	Monitoring Frequency
		- 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 workers openly defecating Sanitary arrangements part of toolbox talk	
	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 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 local s 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	Contractor	Incl in contractor staff costs	# of construction materials left over at the end % of waste at construction site is disposed of appropriately # of waste bins available at construction sites	Throughout project implementation

WB ESF	E&S Risks and Impacts	Mitigation Measures	Responsibility	Budget mitigation (in USD)	for Monitoring Indicator	Monitoring Frequency
	New Material sites and borrow pits	- Once material sites and borrow pits are identified and selected, the process followed to activate it should fulfill all applicable ESF requirements in terms of specific environmental assessments and where necessary update ESMP or add in C ESMP. - Upon works completion rehabilitate borrow pits and quarries by returning surplus material in and around the excavation and grading to stable slopes, revegetating the borrow areas, ensuring proper drainage and that water will not pool in the pit. - Only licensed borrow pits will be selected	PIU/Contract or	5000USD	Availability of adequate E&S plan that includes rehabilitation for management of new quarries and borrow pits in place	Before activity commencement
Operational Phase						
	Risk of soil erosion	- 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						
Construction Phase						
ESS 4	Risk of increased GBV/SEAH cases and risks of sexual exploitation and abuse or sexual harassment, such as	- 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 mitigation (in USD)	Monitoring Indicator	Monitoring Frequency
	requests for sexual favors by project workers	- 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 (Sexually Transmitted Diseases (STIs) , HIV/AIDS, COVID-19 etc..) between workers and the community	- Community awareness sessions on communicable diseases - Provide hand washing stations for workers - Provide mosquito nets for workers - Ensure usage of latrines by workers – through toolbox talks - Implement COVID-19 protection measures, including: - 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	PIU	Incl in PIU staff and travel costs	# of community sensitization % of workers that have signed CoC % of 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.	- Undertake safety precautions to address safety hazards for the nearby community, - Sensitize the local community on the activity of type project and	Contractor	Inc in Contractor budget	# of sensitization measures for communities	At commencement of activity

WB ESF	E&S Risks and Impacts	Mitigation Measures	Responsibility	Budget mitigation (in USD) for	Monitoring Indicator	Monitoring Frequency
		inform them about construction risks and the restricted access to the site • 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 signage available around construction site % 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 • Preassign routes for project traffic Regular maintenance of vehicles to minimize potential for accidents.	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 mitigation for (in USD)	Monitoring Indicator	Monitoring Frequency
	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 • All unnecessary traffic must be strictly limited on site speed controls are to be enforced • Ensure that the construction site is located away from pollution sources • Monitor exhaust emissions to ambient air, waste pollutant releases to land and water.	Contractor	Inc in Contractor budget	% of vehicles well maintained % of engine exhausts with mufflers installed % of activities implemented during the days	Throughout project implementation
Operational Phase						

WB ESF	E&S Risks and Impacts	Mitigation Measures	Responsibility	Budget mitigation (in USD)	Monitoring Indicator	Monitoring Frequency
	Road traffic safety risk ¹⁶ 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 5: Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement						
	19 households that have encroached on public land need to give up 1-2 meters of land encroached on	- Hold community consultation meetings (see Annex 1) - Households to sign Voluntary Land Donations (VLDs) (see Annex 1)	PIU, local authorities	staff costs	# Of community consultations held and consultation minutes signed by participants % of households that have signed a VLD	Prior to commencement of activity
	Impacts on access to businesses	Provide alternative access to businesses through backroads	Local authorities	Staff costs	% of businesses with alternative access	During construction activities
ESS 10: Stakeholder Engagement and Information Disclosure						
ESS 10	Preparation and Construction Phase					
	Risks of poor access to beneficiaries lead to less meaningful community	Implementation of GRM	PIU	PIU GRM costs	% of complaints filed have been addressed	monthly

¹⁶ WB Good Practice Note on Road Safety

WB ESF	E&S Risks and Impacts	Mitigation Measures	Responsibility	Budget mitigation (in USD)	Monitoring Indicator	Monitoring Frequency
	engagements and difficulty in monitoring for social harm	- Monitoring of GRM solutions in a timely manner - Use site-specific incident logs - Implementation of SEP			# of site-specific incident logs	
	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 3 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. Within the PIU, the Social Development Specialist and the Environmental Safeguards Specialist will be responsible for the monitoring of the implementation of the ESMP, including reporting duties. The PIU can 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. The PIU has further deployed a Third Party Monitor (TPM), which monitors E&S mitigation measures across the project components.
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 Contract staff and the supervision teams.
UNOPS	UNOPS Engineers and Safeguard team will be available to provide advisory level support to the PIU during the works implementation on technical and safeguard compliance related matters.

7.2 Contractor

The Contractor is responsible for complying with requirements for all field activities covered by this ESMP. The contractor will have contractual clauses specifying compliance with the mitigation measures listed in the ESMP and in the WBG EHS Guidelines, in addition to national requirements and to indicate measures taken in cases of non-compliance. 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. 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.
- 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.

- 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 4 below. A template for an Environmental and Social Monitoring template is included in Annex 3.

Table 4 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 • worker accommodations for foreign workers; • highlights of inspection • Training conducted and workers participated • Workers grievances • Community grievances • Chance find (if any), in accordance with Project Chance Find Procedures (Annex 5)	Monthly	Contractor/SPT
2	ESMP Monitoring Report to WB	Compliance status of overall Project with ESMP requirements	Quarterly	PIU

9. Capacity Building and Training

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

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

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

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

This will be achieved by small workshops conducted in the induction phase for the workers. The induction training will include familiarization with the workers' GRM, Project GRM, CoC, GBV/SEA/SH, HIV/AIDS prevention, COVID-19 measures, and other toolbox talks as mentioned above in the ESMP. During the construction phase, refresher trainings will be held. While some training will be provided by the contractor, the PIU has assessed that training on GBV/SEA/SH and GRM should be conducted by the PIU directly, given a potential lack of capacity among contractors.

9. Stakeholder Consultations

The preparation of the ESMP and of the project selection and design was highly dependent on stakeholder consultations, conducted as per the SCRP Stakeholder Engagement Plan (SEP).¹⁷

On the 10th of March, 2021 the PIU-UNOPS consultation mission team met with the district administration to discuss the facilities/sites/roads identified by prioritization activities with the SWS Ministry of Planning and relevant Ministries, which took place in Baidoa in Mid-October, 2020. The PIU members informed the District Administration of the Somalia Crisis Recovery Project and its main objectives which were welcomed by the administration. The District Commissioner welcomed the team and emphasized the importance of rehabilitating roads, wells and health facilities in Hudur, as this is a city that has been cut-off from Somalia for over 8 years, he also highlighted that this is the first time that a government delegation took the decision to come to Hudur and assesses roads, water point sources and health centres.

The administration of Hudur informed the team that the main challenges that have gripped the population of Hudur are in-accessible roads that are damaged.

They emphasized that flash floods in the district have caused a village in the Hudur district (Buulow) to be completely inaccessible as the water floods the roads and blocks passages to the village. They also informed the team that all shallow wells and the boreholes are located in Buulow, which means the remaining population of Hudur have no access to these wells. The District Administration stated that when heavy rains and flash floods occur, all roads in the district are flooded and blocked, which means that villages are inaccessible and halt the population from going about their daily lives, such as collecting water from wells etc...

The PIU/UNOPS assessment team met with the stakeholders of the community and discussed ways of addressing impacts of flash floods and damage to roads, WASH and health facilities in the district.

Meetings with elders: The elders of Hudur District stated that the main problem within the district is the state of the roads, which are in poor condition and stated that whenever heavy rains occur, which is frequent, the roads are inaccessible and several cars have been affected whilst trying to access the flash flooded roads. The elders also stated that when heavy rains and flash floods occur, dirty water becomes mixed with the unprotected shallow wells, which are a cause of outbreaks of diseases, which Hudur is not able to cope with as health facilities are insufficient. So, the elders requested that roads be constructed to ease the situation and also to raise the level and cover the shallow wells.

¹⁷ Government of Somalila, Somalia Crisis Recovery Project, Stakeholder Engagement Plan (SEP), 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>; Stakeholder consultation were held in accordance to the WB's 'Citizen Engagement and Stakeholder Consultations during COVID 19', accessed at: <https://www.worldbank.org/en/news/factsheet/2020/12/01/citizen-engagement-and-stakeholder-consultations-during-covid-19>

Meeting with religious scholars: The religious scholars of Hudur stated that whenever the recurrent flash floods occur, one village is completely inaccessible due to the floods as it's surrounded by water and that the inhabitants of this village, including the children, have no access to schools or mosques, which are closed for up to 2 months as a consequence. They also stated that it is extremely difficult to reach women and children in need when these flash floods occur. They requested that the starting point of flash floods and rainy waters be blocked off from the district and be re-directed to the lake nearby.

Meeting with women: The women group of Hudur stated that health facilities in the district are unsatisfactory and when C-Section operations are needed for women who cannot go into labour, they have to be air-lifted to Mogadishu which is also a major dilemma as there are only two flights a week to the capital.

Furthermore, when recurrent flash floods happen, the roads are cut-off, making it very difficult for the mothers to access water from the wells for their families. Flood waters that occupy the roads are also causes of infections and diseases, which affect children as they often play outdoors. The women groups requested that more MCHs be constructed in the district as they are currently insufficient, and for the construction of the MCH bricks and not iron-sheets should be used, so they are finally given adequate maternity facilities.

Meeting with youth: The youth group in the district stated that there is an urgent need for roads to be constructed in the district, which will generate temporary employment for the youth during the construction and also added that the construction of roads will mean that the impact of flash floods will decrease greatly.

Meeting with agro-pastoralists: The agro-pastoralists, farmers and herding communities informed the team that the heavy rainfalls, which cause flash floods have affected them greatly as they destroy all the crops and farming equipment, which have caused us to use our bare hands to produce our crops, they requested that the flash flood water be blocked off from the city and be re-directed to the lakes.

Meeting with the business community: The business community in Hudur District have stated that the economic status of the district is very low and has collapsed since the cut-off by Al-Shabaab since 2014, they requested that roads be constructed in the district, which will assist the accessibility of the city and gradually positively impact the economic status of the city.

Meeting with IDPs: The IDPs stated that they had fled and become displaced from their Abal due to Al-Shabaab giving orders for the whole tribe to leave the village or be massacred, they left their farms, livestock and life possessions and had no choice but to flee. They stated that their IDP camp is not flood-damaged and stated that their only problem with the flash floods is the inaccessibility of roads, meaning that they cannot fend for their daily livelihoods. The IDPs also informed the team that there are days where families do not cook food or are able to buy essential items due to unemployment and discrimination towards them and a general lack of

opportunities. They requested that water kiosks be constructed inside or nearby the IDP camps and MCHs be constructed especially for women and children.



Figure 0.1 Community Meetings in Hudur

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

Table Stakeholder consultation records

Date	Type of Consultation	Stakeholders Consulted	Issues discussed
2 - 10 March 2021	Stakeholder consultation and initial roads assessment visit to Hudur.	Regional commissioner, Ministry of Public Works, District Commissioner, Hudur, IDPs, youth and women's representatives, community elders, business people and religious leaders (Approximately 50 No. stakeholders)	Flood risk to the community Prioritization of infrastructure for rehabilitation works Security assessment and accessibility Beneficiaries' community - potential impact of reconstruction of the roads.

Date	Type of Consultation	Stakeholders Consulted	Issues discussed
7 th – 13 th May 2021	Technical Assessment of Far Libaax Road by UNOPS Road Engineer	Regional commissioner, Ministry of Public Works, District Commisioner, Hudur. (Approx. 5 No.)	1- road damage assessment 2- priority areas. 3- level of road accessibility. 4 context and environmental and safeguard issues. 5- Social impacts and priorities.
5 th – 12 th June 2021	Geotechnical and topographical data collection of Hudur roads by UNOPS Material Engineer & Surveyors	Regional commissioner, Ministry of Public Works, District Commisioner, Hudur. (Approx. 5 No.)	Purpose of the Geotechnical and topographical data collection and the schedule
18 th -21st September	UNOPS Drainage Engineer assessment field visit to Hudur	Regional commissioner, Ministry of Public Works, District Commisioner, Hudur. (Approx. 5 No.)	Assessment of drainage system to incorporate to the design.
26 December 2021	Client Review: Technical Review of the Detailed Design Review (via email)	Project Coordinator – SPT, South West State	Detailed designs were reviewed and approved by the State Project Team Coordinator.
On-going	C2 COP meetings	PIU, World Bank & UNOPS - technical meetings	Planning, consultation, design standards, implementation scheduling etc.
In progress	World Bank technical review of the road designs	World Bank Technical Lead	Pending
23 May 2022	Land and Resettlement consultations	Hudur Municipality	Households encroached on Bilimaqasi Road; formation of GRM Committee;

Date	Type of Consultation	Stakeholders Consulted	Issues discussed
			Business access on Main Road (see Annex 1)
25 May 2022	Land and Resettlement consultations	Affected households along Bilimaqasi Road	Requirement to widen the road; 19 households who had previously encroached on governmental land dedicated for road widening to provide 1-2 meters of the land; 19 households agreed and signed VLDs (see Annex 1)

10. Grievance Redress Mechanisms

Under the new World Bank ESSs, Bank-supported projects are required to facilitate mechanisms that address concerns and grievances that arise in connection with a project.¹⁸ 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’.¹⁹ This Project GRM facilitates the Project to respond to concerns and grievances of the project-affected parties related to the environmental and social performance of the project. The SCRP provides mechanisms to receive and facilitate resolutions to such concerns. This section lays out the grievance redressal mechanisms (GRM) for the SCRP.

As per World Bank standards, the GRM operates in addition to a GBV/SEAH and Child Protection Prevention and Response Plan, which includes reporting and referral guidelines (see GBV/SEAH and Child Protection Prevention and Response Plan in the ESMF²⁰). It also operates in addition to specific workers’ grievance redress mechanisms, which are laid out in the LMP (which is included in 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 Appendix 2.

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

¹⁹ World Bank, Environmental and Social Framework, 2018, p. 131.

²⁰ 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

11. Implementation Budget

	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 +tbd
	TOTAL	27 000

Table 5 Implementation Budget

12. Conclusions

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

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

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

References

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World Population Review: Somalia, accessed at: <https://worldpopulationreview.com/countries/cities/somalia>

World Bank, Environmental and Social Framework, 2018.

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Annex 1: Community Consultations

General Community Consultations:

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 (SCRIP)

Date: 10/3/2021

Subject: Attendance Sheet Field Mission Hudur

No	Name	Title	Telephone
1	Abdirahman Mohamed Abdul	Regional Coordinator / Mark	0619453989
2	Abdullahi Hassan	DR	06581337
3	Muhammad Macalin Ahmed	PC	5581658
4	Muhammad Adan Adan	Q/xigeenka Degmada	615581658
5	Abdirasheed Mohamed Abdi	Executive secretary of Hudur	0616174879
6	Nuur Ahmed Hassan	Galaxadegaanka	0615581635
7	Abdullahi Nur Hassan	Galaxadegaanka	615532511
8	Wardheere Ahmed Abdi	Magaalada	0615581615
9	Abdullahi Nur Ismaaciil	Mamulka	0615893974
10	Abdullahi Hassan	M. degmada	5864092
11	Abdullahi Saad Mahmud	mx - muraqib	5907126
12	Adonis Abdullahaan Madan	Q/xigeenka	615918334
13	Xalimo Sheekh Muriis	Magaalada	615553575
14	Abdulla Nuur Adan	Xaawanka	613003090
15	Mohamed Ahmed Mahmud	Xafadaha shidde	618849595
16	Xaawanka Hassan Adan	Xafada Bimilow	615158151

19	Ahmed Murtasaa	Ganacsade	0619369336
20	Sanhuury Adan Adan	Ganacsade	615592083
21	Nuur Macalin Abdullahi	odayaasha dhaganka	615216659
22	Nurain Ali Ibrahim	Odayaasha dhaganka	615161837
23	Sheekh Ali Ibrahim	Culimada	6159412997
24	Abdullahi Shuuriye	Culimada	614507482
25	Larbiin Sunkuu	Shaqaalaha degmada	615606651
26	Mayow Abdi	Xafada sh. A.W.	615101839
27	Mohamed Ahmed Macalin	At iskudumad M. Baraka	615151327
29	Adan Sallaf Ali	Odayaasha dhaganka	615692406
30	Isaac Ali Abdulle	Xafada - Xaawanka	615545496
31	Mohamed Mukhaal Adan	Q/xigeenka dhaganka	615515541
32	Xassan Mohamed Ali	u. dhaganka	615424283
33	Xassan Mohamed Isaac	Mamulka degmada	615408712
34	Mohamed Ahmed Mohamed	Xigeenka degmada	61219822
35	Jabril Yuusuf Maany	Mamulka degmada	618015990
36	Amno Abdullahi Jermis	Shaqaalaha degmada	618033780
37	Dr. Abdullahi Mohamed	S.W.S	0615623293
38	Mohamed Abdullahaan Osman	Q/xigeenka dhaganka	0616333742
39	Abdullahi Adam Samsir	Q/xigeenka dhaganka	0616639000
40	Abdullahi Hassan Hussein	Q/xigeenka dhaganka	615581647
41	Abdullahi Raabow Ali	IDPS	0615879162
42	Mervat Ali Ase	IDPS	0619679353

43	Fiddle Aden Ibrahim	G.R/IDP	0618581464
44	HASSAN MOHAMED SHEIKH	NRC	0616852956
45	Alimow Hassan Ali	Sos children village	0615545798
46	Mohamed Rahmo	ACP	0618523809
47	Abdirizak Ali Mohamed	ACF FSL PM	0615918208
48	Mohamed Abdullahi Hassan	MARO	0615557799
49	Abdikani Hassan Ali	MARO	0616619412
50	Abdulahi Hussein Salaa	NRC	0615581640

Consultations specific to land and resettlement issues:

Blimaqasi Road Community Engagement Meeting

Attendance sheet

Date: 25/05/2022

NO	Participant Name	Gender	Road Name	Contact	Signature
1.	Abdikarim Mohamed Yare	Male	Blimaqasi	0615627251	Abdi Karim
2.	Soomow Hussein Ibrahim	Male	Blimaqasi	06152424367	2000
3.	Ali Nuraw Ibrahim	Male	Blimaqasi	0610107814	
4.	Asha Rahaw Hassan	Female	Blimaqasi	0615140577	X
5.	Sacir Hassan Adan	Male	Blimaqasi	06152424284	S
6.	Duniya Hassan Adan	Female	Blimaqasi	0615829072	CH
7.	Ali Humow Adan	Male	Blimaqasi	0616009368	2000
8.	Hawo Hadar Modoke	Female	Blimaqasi	0616174557	
9.	Abdullah Mohamed Ismail	Male	Blimaqasi	0615803034	Abdullahi Mohamed
10.	Zahra Mohamed Ali	Female	Blimaqasi	0619817615	ZAHRA
11.	Faduma Takow Adan	Female	Blimaqasi	0619455749	Faduma
12.	Adan Mohamed Saliz	Male	Blimaqasi	0615532493	Adan
13.	Shukri Adom Ali	Female	Blimaqasi	0614234535	Shukri

14.	Masraf Adan Mursal	Male	Blimagasi	0618123855	u
15.	Fartun Abdurahman Ibrahim	Female	Blimagasi	0612378470	Fartun
16.	Abdullahi Ahmed Adan	Male	Blimagasi	0615027641	Abdullahi
17.	Nimco Abdullahi Ahmed	Female	Blimagasi	0618849018	Qadow
18.	Nuraw Mukhtar Mohamed	Male	Blimagasi	0615882479	Q
19.	Samwine Mohamed Khair	Male	Blimagasi	0618123420	Samwine
20.	Habibo Mohamed Nuraw	Female	Blimagasi	0617047096	Qeen
21.	Adan Mohamed Khair	Male	Blimagasi	0615310180	Adan
22.	Digado Mohamed Hassan	Female	Blimagasi	0615829072	Q
23.	Ali Adan Adan	Male	Blimagasi	0615882502	R
24.	Hamdi Mohamed Khair	Female	Blimagasi	0615354595	Xandi
25.	Nadiya Dalir Mohamed	Female	Blimagasi	0616174537	AS
26.	Nurey Moalin Ibrahim	Female	Blimagasi	0616207405	Nurey
27.	Maryam Ali Hassan	Female	Blimagasi	0615911387	MAH
28.	Ruqun Moalin Adan	Female	Blimagasi	0616225755 06162	R

29.	Zahra Samay Ali	Female	Blimagasi	0619734865	Zahra
30.	Farhiyo Bitimin Adan	Female	Blimagasi	0618415530	Farhiyo
31.	Nurey Moalim Kerad	Female	Blimagasi	0618581210	Nurey

Meeting with Hudur Municipality Date: 23/05/2022

Attendance sheet

NO	Participant Name	Title	Contact	Signature
1.	Wardheere Ahmed	X. Huseinlahagud	0615581615	Wardheere
2.	Wafiqin Cabdullahi Xasan	m	5864092	Wafiqin
3.	Maxied Osman maxied	Amniiga bulsh	0615581615	Maxied
4.	C/laahi Xuseen C/maan	Amni	061553254	C/laahi
5.	C/laahi nuur Sai xasan	G. Kuxigeen	0615815370	C/laahi
6.	Musabax Adan	G. Kuxigeen	0615581651	Musabax
7.	Nuur Ahmed Xasan	G. Huseinlahagud	061581635	Nuur
8.	Hoossein Mohamed Isack	Amni	61540872	Hoossein
9.	Cuuse isaaq Maxied	X. Huseinlahagud	0615303501	Cuuse
10.	Ibrahim isaaq ibrahi	G/Amniiga	065864052	Ibrahim
11.	C/laahi Warsame Ali	G/maaliyada	0615598166	C/laahi
12.	Abdulkari Nuur Abukari	XAFiskaPRIMA	0615893974	Abdulkari
13.	C/laahi C/maan maxied	X/Amniiga	0615531969	C/laahi
14.	Adan isaaq ibrahim	X/Qorshaynta	0615692106	Adan
15.	Salah Mohamed Ali	SPT Engineer	0618458322	Salah
16.	Adan Abdi Adan	S. project Coordinator	0615918230	Adan
17.	Abdirahim Adan Isack	Environmental Safety	0613991600	Abdirahim
18.	Adan Kervat Abdi	SPT-project Coordinator	0615235514	Adan
19.	Kadon maxamed Abdi	Xooga gahad/qa	0615115580	Kadon
20.				

VLDs signed:



Voluntary Land Donation and Consent Form

That the Owner hereby grants to the Recipient this asset for the construction and development of Road on Bellow Measurement for the benefit of the community and the public at large. That the owner has been fully informed about all project modalities and provides free, prior and informed consent. Bellow is Authorized and Signed.

Impact land measurement									
No	Name of the PAPs	Cellphone	Gender	Road Name	Type	Width	Length	Signature	
1.	Nimco Abdullahi	0618549018	Female	Blimagasi	Fence	0.75m	25m	See below	
2.	Abdullahi Mohammed Ismail	0615803034	Male	Blimagasi	Fence	0.5m	30m	Abdullahi Mohammed	
3.	Adan Mohammed Salih	0615532493	Male	Blimagasi	Fence	0.5m	20m	Adan	
4.	Mustaf Adan Mursal	0618123855	Male	Blimagasi	Fence	0.5m	31m	ce	
5.	Abdullahi Ahmed Adan	0615027641	Male	Blimagasi	Fence	0.5m	12m		
6.	Nurew Mukhtar Mohammed	0615882479	Male	Blimagasi	Fence	1m	15m	Nurew	
7.	Sonwino Mohammed Kheir	0618123420	Male	Blimagasi	Fence	1m	28m	Sonwino	
8.	Habibo Mohammed Nurew	0617047096	Female	Blimagasi	Fence	1m	16m		
9.	Adan Mohammed Kheir	0615310180	Male	Blimagasi	Fence	1.75m	20m	Adan	
10.	Ali Humaw Adan	0616009368	Male	Blimagasi	Fence	1m	25m	Ali Humaw	
11.	Abdulkarim Mohammed Yese	0615627251	Male	Blimagasi	Fence	2m	35m	Abdulkarim	
12.	Soomaw Hussein Ibrahim	0615424367	Male	Blimagasi	Fence	1.75m	23m	Soomaw	
13.	Ali Nurew Ibrahim	0610107814	Male	Blimagasi	Fence	1.75m	13m		
14.	Saeid Hassan Adan	0615424254	Male	Blimagasi	Fence	1m	22m	Saeid	
15.	Hawo Hadar Modobe	0616174557	Female	Blimagasi	Fence	0.5m	23m		
16.	Duniya Hassan Adan	0616879181	Female	Blimagasi	Fence	0.5m	22m		
17.	Asha Rahow Hassan	0615140577	Female	Blimagasi	Fence	1m	35m	Asha	
18.	Diyoado Mohammed Hassan	0615870072	Female	Blimagasi	Fence	0.5m	25m		
19.	Ali Adan Adan (Mutu)	0615310180	Male	Blimagasi	Fence	0.5m	7m	Ali Adan	

Annex 2: Grievance Redress Mechanisms

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

GRM Objectives

The key objective of the Project 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 GRM is available for anyone who wishes to file a complaint, including project workers, community workers, persons aggrieved by the resettlement process etc... In addition, implementing partners and contractors are encouraged to provide a distinct workers' grievance mechanism, however, lessons to date have shown that there is a significant lack of capacity and that the Project GRM needs to be fit to receive also workers concerns.

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

Table 6 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 complaints about noise, dust, pollution, waste accumulation, debris, wastewater, damages to the eco system etc...
9. Occupational Health and Safety (OHS) and Community Health and Safety
- Violation of occupational health and safety measures and standards laid out in the ESMF, ESMPs
- Issues of Community Health and Safety
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.²¹ They should be manned by the IP staff, especially its community project facilitators, in close coordination with local authorities. At the help desk, PAPs can inquire about information in regard to project activities, or they can file a grievance directly with the person manning the desk. Grievances can be filed in writing or verbally at the Help Desk.

Relevant assigned personnel available in each project site will be required to accept formal grievances and ensure that avenues for lodging grievances are accessible to the public and all PAPs. The first point of contact for all potential grievances from community members may be the

²¹ The help desk must be budgeted by the IP, the manning of the help desk will depend on the nature of the activity

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.

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 7 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	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

interventions of a different kind	number of men and women), which can hear both parties and ideally solve the matter within the organization.
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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

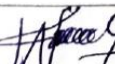
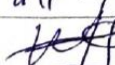
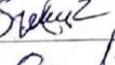
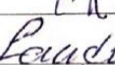
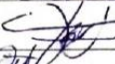
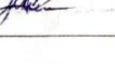
Response Times

Table 8 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 require 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

Hudur GRM Committee

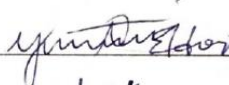
In addition to the Project-level GRM, a specific GRM Committee has been established and trained for the road rehabilitation in Hudur.

No	Conflict Resolution and Resettlement Committee. (CRC) Dedicated on handling disputes (Representative from the PAPs, Local Authority, clan chiefs, community elders, women, Youth etc.) within Bilimigasi and Main road.					
#	Name of Member	Gender	Representative Member /	Contact	District	Sign
1	Nuur Ahmed Hassan	Male	Head of Public Work Chair	0615581635	Hudur	
2	Faduma Saman Mohamed	Female	Vice Chair	0615907063		
3	Wardheere Ahmed Abdi	Male	Deputy Public Work Secretary	0615864089		
4	Mohamed Abdirahman Mohamed	Male	Chief	0615545465		
5	Shiney Sheikh Mohamed	Male	Head of Farmers Association	06155335959		
6	Salaad Adan Manur	Male	Civil Society	0615691764		
7	Ali Adan Wiir	Male	Community Elder	0615502344		
8	Ali Abdullahi Dirir	Male	Youth Leader	0617286546		
9	Faduma Ahmed Ali	Female	Civil Society	0615893703		
10	Ali Sangarey Hassan	Male	Businessman	0615513464		
11	Hassan Mohamed Issaq	Male	IDPs	0615408712		

Signature of the GRC Chairman

Signature of the GRC Member

Witnesses: District council

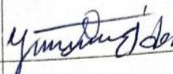
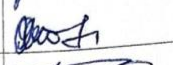
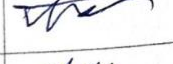
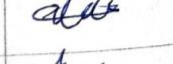
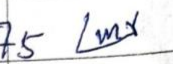
1. Issa Issaq Manur 

2. Wardheere Ahmed Abdi 
(Signature, name and address)

GRC Training

Attendance sheet

Date: 28/05/2022

NO	Participant Name	Title	Contact	Signature
1.	Yassir Mohamed Nasser	Secretary	0615536473	
2.	Ahmed Sheikh Yussuf	Businessman	0615864089	
3.	Mohamed Yere Abukar	Community Elder	0616051785	
4.	Faduma Abduhman Mohamed	Vice Chair	0615918334	
5.	Ise Issaq Maanur	Chair	0615303501	
6.	Naurigo Hassan Mohamed.	Member	0616733680	
7.	Halima Sheikh Miris	Member	0615553575	
8.				

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 Environmental Monitoring Plan

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

Annex 4: Code of Conduct for Workers

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

1. Scope of Application:

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

2. Continuous Improvement:

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

3. Management, Monitoring and Evaluation:

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

Labor:

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

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

labor in all its forms.

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

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

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

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

Human Rights:

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

11. Harassment, Harsh or Inhumane Treatment: It is expected that contractors create and maintain an environment that treats all employees with dignity and respect. It is further expected

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

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

Environment:

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

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

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

16. Air Emissions: Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterized, monitored, controlled and treated as required prior to discharge or disposal.

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

Ethical conduct:

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

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

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

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

Annex 5: Chance Find Procedures

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

This procedure is included as a standard provision in the implementation of SCRP Public Works contracts to ensure the protection of cultural heritage (Archaeological and Historical Sites). All implementers / contractors will be required to observe this procedure as documented hereafter.

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

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