

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 Imbereso Road
Barawe District
South West State

6 October 2022

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

Imbreso road is the main access road connecting Barawe town to the Mogadishu - Kismayo Interstate Road. The road starts in town and heads north west to join the Mogadishu - Kismayo Road at Imbereso village. The proposed Road extends 2.5km along the Mogadishu-Kismayo Road to the Airport. The community prioritised this road as it is the only supply route into town. When it rains, the town is cut-off completely and the villagers are unable to access the town. This subproject proposes to improve the pavement and geometric components of the road to address damage caused by surface runoff.

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 road. 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 SCRP 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, and pastoralists that benefit due to improved access to the urban centers for social services, access to livelihood opportunities and economic gains; as well as the improvement of the connection of Barawe town to the interstate road to Kismayo and Mogadishu.

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

This ESMP lays out the specific adverse risks and impacts anticipated for the project and the respective mitigation measures, and lists monitoring responsibilities. It shows exactly what must

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

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) in the Ministry of Finance, Mogadishu, 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 road 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 Imbereso Road

has 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 road. 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, and there is no cultural heritage findings expected.

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. The selected Hudur road to be rehabilitated does not imply any land acquisition related risks, as the road already exists on public land and no further land needs to be acquired.

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 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. These guidelines contain the performance levels and measures that are acceptable to the WB. When the national

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>

regulation differs from the levels and measures presented in these guidelines, the subproject will be required to achieve whichever is more stringent.

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

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

2.5 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 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources			
The Objectives of ESS 6 are: To protect and conserve biodiversity and habitats. To apply the mitigation hierarchy and the precautionary approach in the design and implementation of projects that could have an impact on biodiversity. To promote the sustainable management of living natural resources. To support livelihoods of local communities, including Indigenous Peoples, and inclusive economic development, through the adoption of practices that integrate conservation needs and development priorities.	<u>Provisional Constitution of the Federal Republic of Somalia.</u> Article 25 of the Constitution states that every Somali has the right to an environment that is not harmful to them, and to be protected from pollution and harmful materials. Every Somali has a right to have a share of the natural resources of the country, whilst being protected from excessive and damaging 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 safeguards and enhance the environment and participate	No detailed laws govern biodiversity conservation and sustainable management of living natural resources at this point.	The sub-project does not encroach into any modified, natural, critical habitat and/or protected areas

ESF Objectives	National Laws and Requirements	Gaps	Recommended Actions
	in the development, execution, management, conservation and protection of the natural resources and the environment		
ESS 8: Cultural Heritage			
The Objectives of ESS 8 are: To protect cultural heritage from the adverse 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 use of cultural heritage.	n/a	n/a	The Project will implement chance find procedures to protect cultural or archeological findings during project activities, as per Chance Find Procedures.
ESS 10: Stakeholder Engagement and Information Disclosure			
The Objectives of ESS 10 are: To establish a systematic approach to stakeholder engagement that will help Borrowers identify stakeholders and build and maintain a constructive relationship with them, in particular project-affected parties. To assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be taken into account in project design and environmental and social performance.	<u>Provisional Constitution of the Federal Republic of Somalia.</u> Article 32 stipulated that every person has the right of access to information held by the State. The Federal Parliament shall enact a law to ensure the right of access to information	The law on the right of access to information currently only exists as a draft	The sub-project has implemented stakeholder consultations and will continue to do so, based on the Project Stakeholder Consultation Plan (SEP)⁸ The SCRП 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>

ESF Objectives	National Laws and Requirements	Gaps	Recommended Actions
To promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life-cycle on issues that could potentially affect them. To ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format. To provide project-affected parties with accessible and inclusive means to raise issues and grievances, and allow Borrowers to respond to and manage such grievances.			

3. Biophysical and Socio-Economic Environment

This section describes the overall baseline condition of Barawe 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

Barawe town and district are located in SWS. Barawe is a coastal town, as indicated in the map below.



Figure 1 Map of Somalia with Barawe town

The below map shows the concrete subproject location, the black line indicates Imbereso Road, which is to be rehabilitated.

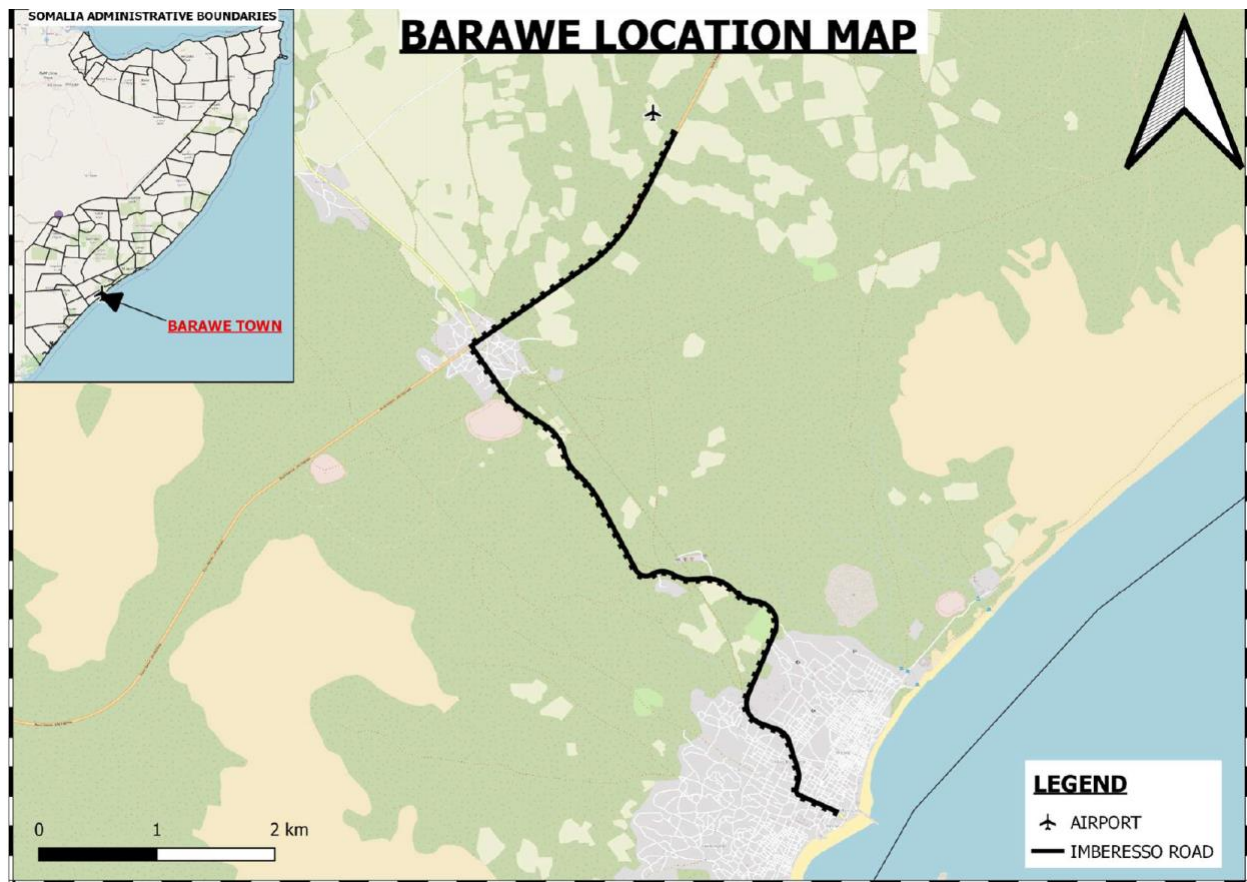


Figure 2 Imbereso Road, to be rehabilitated

3.2 Physical Environment

Topography: Barawe District is located at the coast in SWS, southern Somalia. The average elevation is 19 meters. The vegetation cover is mostly shrubland with no undergrowth.



Figure 3 Barawe Town at the Indian Ocean

Geology and Soil: The regional geology of Barawe consists of silty clays, sands and gravels from fluvial, alluvial or aeolian deposition. An extract of the geological map of the area is shown in the Figure below:

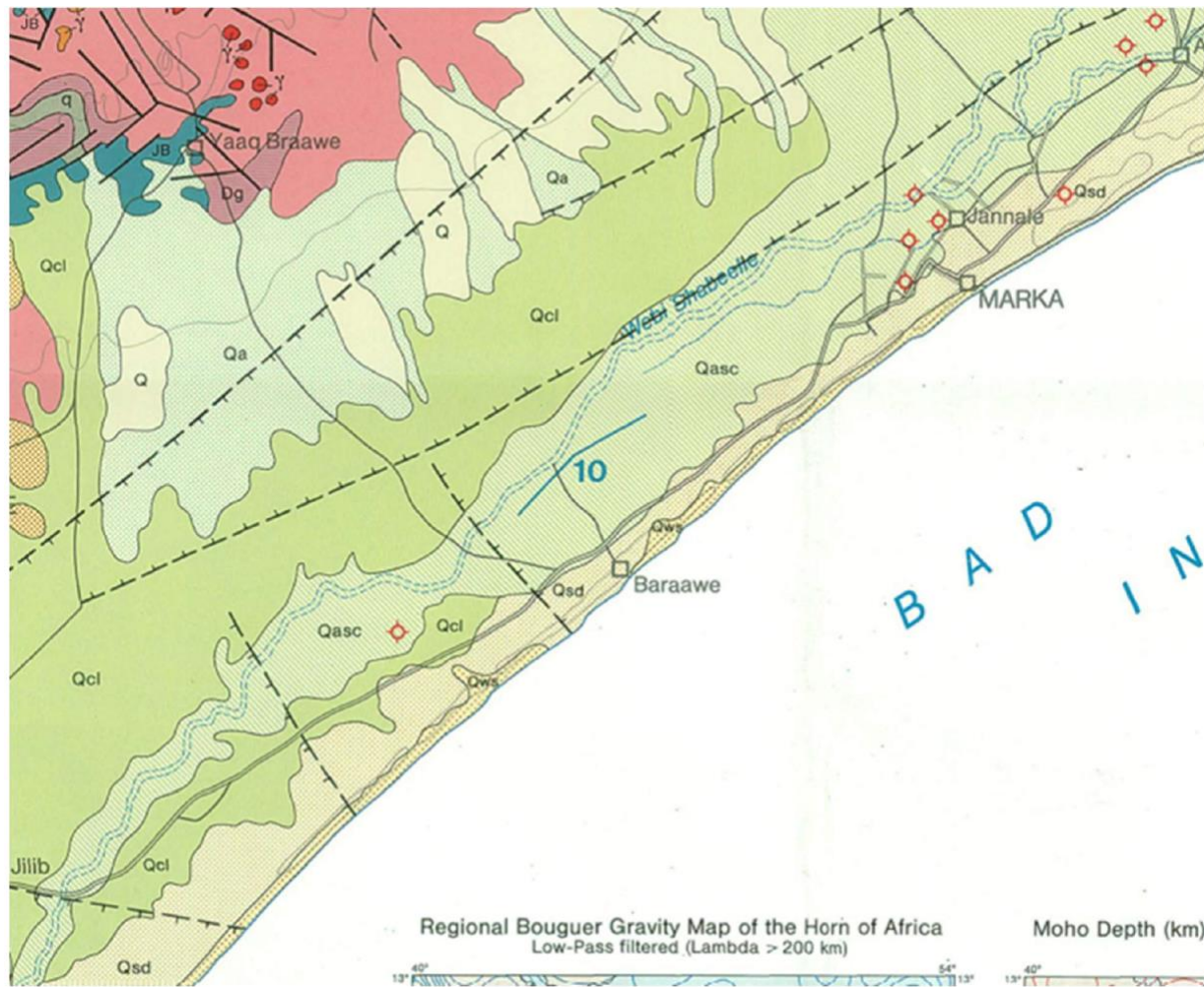


Figure 4 Extract of geological map from central and southern Somalia

Barawe sits on a gently sloping bench and is bordered by the sea to the east and a ridge on the inland side. This ridge is composed of deep alluvial red silty sand. This forms the catchment and during rains generates flood flows, which carry sand and dumps into the town below. There are deep gullies created by flood flows downslope. These floods cross the main road from Mogadishu, which also serves the airport, and cut off sections, completely paralysing supply into the town.

The laboratory test results indicate the natural subgrade soils along Imbereso road are A-2-6. The soils can be described as clayey gravels and sands. The soil is rated as excellent to good. The Maximum Dry Density (MDD) and the Optimum Moisture Contents (OMC) of the alignment soils are consistent with typical values for clayey sands or clayey gravel soils. The MDD and OMC range between 1398kg/m³ to 1505kg/m³ and 7.7 percent - 9.7 percent respectively. The subgrade soil meets the minimum requirements for use as earthworks materials i.e., Plasticity Index (PI) 30

percent for gravel roads, and 50 percent for flexible and rigid pavements. The PI of the alignment soils ranges from 13.2 percent to 22.2 percent.

Climate: Barawe lies ca. 19 meters above sea level, and its climate is mostly coastal, hot during the year, with erratic and unreliable rains.

Temperatures hover all year-round between 29-32°C, with March and April as the hottest months with an average of 32°C during the day and 26/27°C during the night and July-August as the coldest months with 28°C during the day and 24 °C during the night.

Most of the rainfall occurs in April and May, with 5 rainy days per month and the least rainfall occurs in January, February and September – with 0 days per months.

Barawe, Somalia Weather Averages

Month	Day	Night	Rain Da
January	31°C	25°C	0
February	31°C	25°C	0
March	32°C	26°C	0
April	32°C	27°C	5
May	31°C	26°C	5
June	29°C	25°C	1
July	28°C	24°C	2
August	28°C	24°C	1
September	29°C	25°C	0
October	30°C	26°C	2
November	30°C	26°C	3
December	31°C	25°C	2

Figure 5 Barawe monthly average temperatures

Monthly Average Rainfall

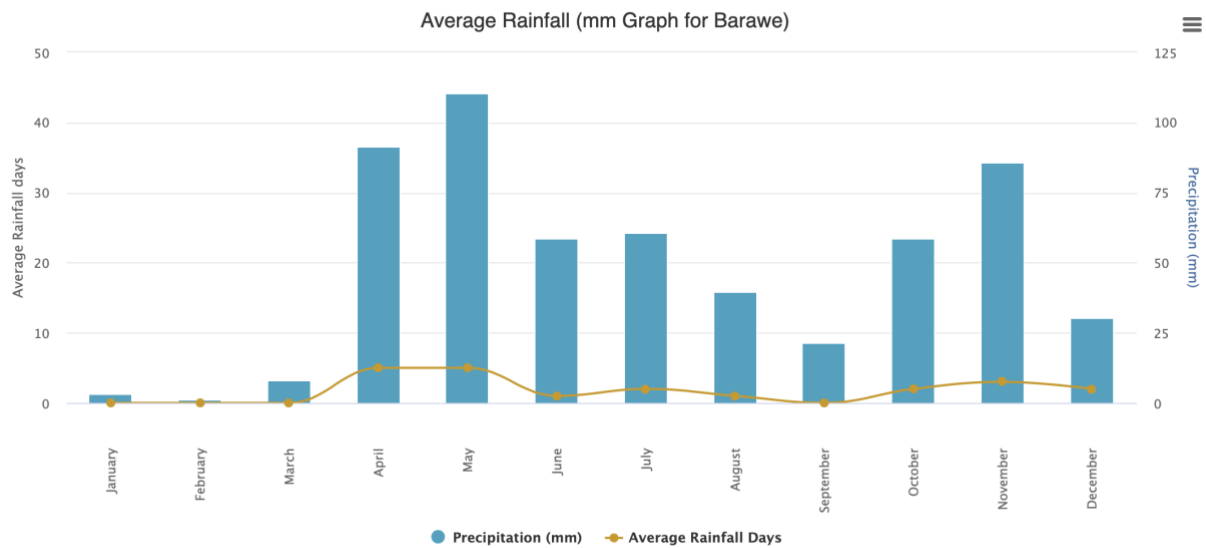


Figure 6 Annual Maximum 24-hour rainfall series at Huddur station (located in close proximity to the roads, ca. 5 km)

Monthly Average Temperature

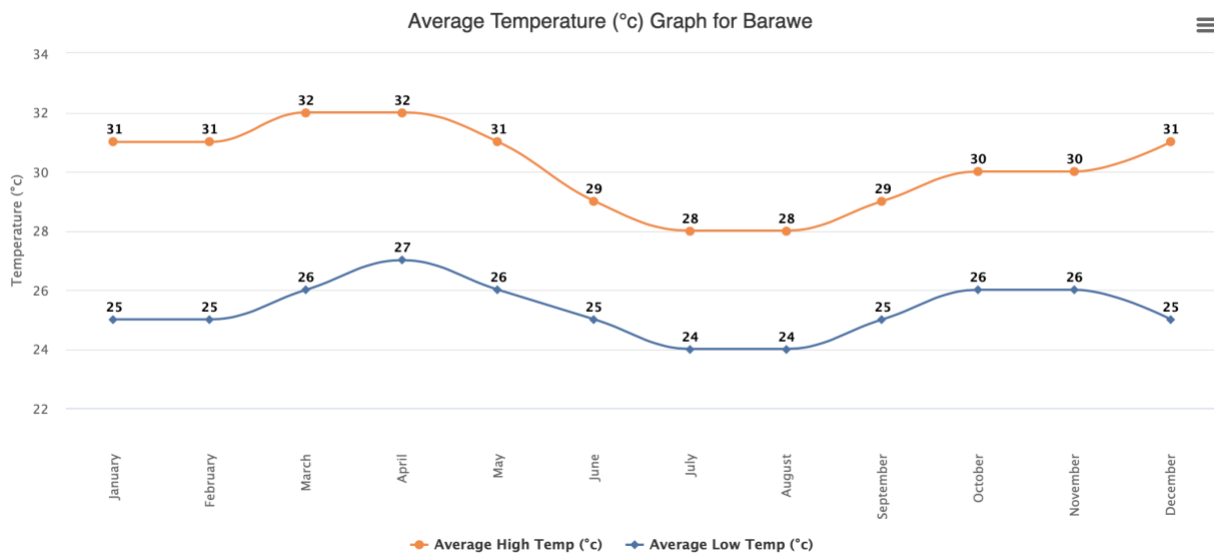


Figure 7 Max, Min and Average Temperature in Barawe⁹

⁹ World Weather Online, Barawe, accessed at: <https://www.worldweatheronline.com/barawe-weather-averages/shabeellah-hoose/so.aspx>

Water Resources and Hydrology: The subproject area lies about 220 km southwest of the capital Mogadishu, in the Shabelle basin, a transboundary catchment that covers an approximate area of 283,054 km². Barawe town is a coastal town which is flanked with hills on the northwestern side, forming a catchment divide. The drainageways across the Imberesso Road runs in two directions; from the northwest to the Indian Ocean in the southeast and from the northeast to the northwest.

The average slope percentage of the catchment areas in the project area is about 6.62 percent, which can be termed as rolling based on the TRRL classification as presented below:

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

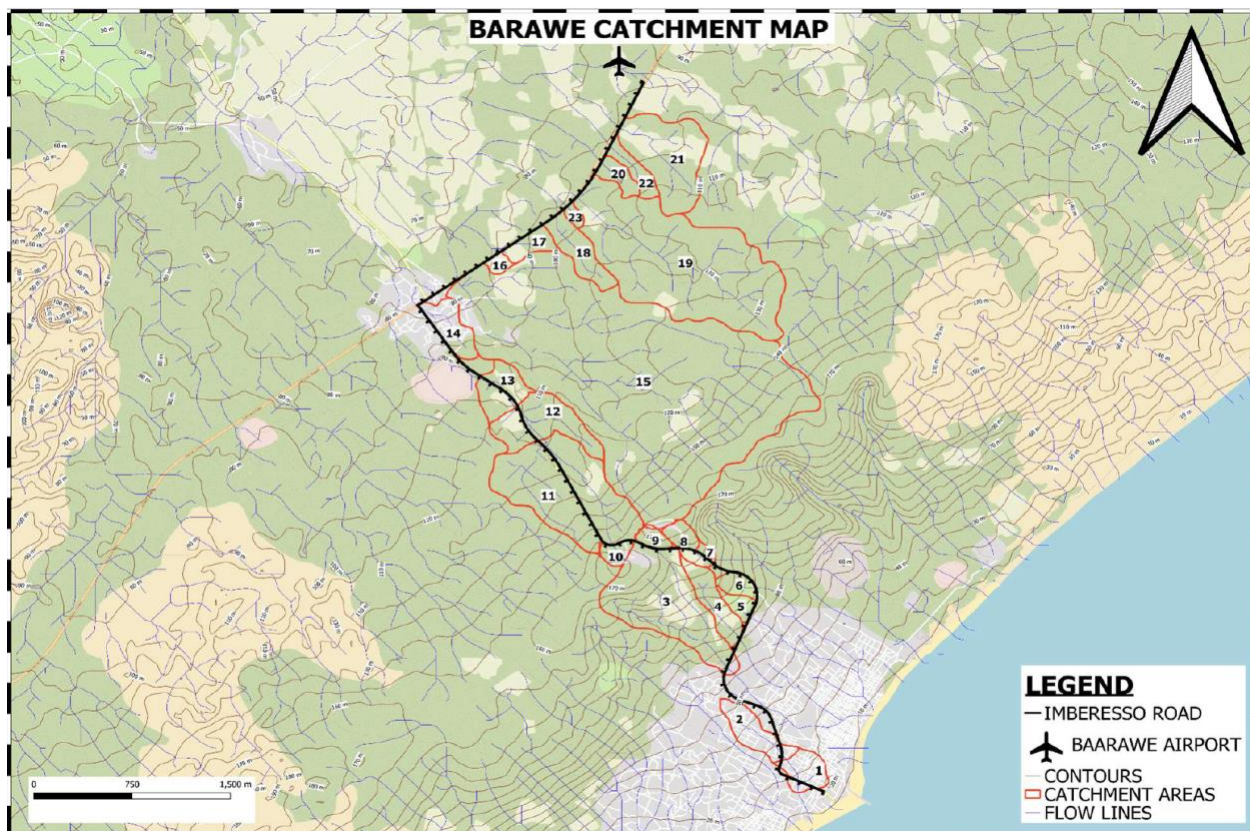


Figure 8 Map of the drainage area in Barawe

Biological Environment: There are no environmentally sensitive habitats in the project area. Only 0.8% of the Somalis area is under some form of protection (2000). Lower Shabelle, as Somalia generally has 24 important bird areas. Generally, fauna has been depleted due to hunting and culling to protect livestock. Invasive species (e.g. *Prosopis* spp. and the Indian House crow, *Corvus splendens*) have widespread effects on local fauna and flora and important to address. The fauna is dominated by several livestock species, including the Somali goat, Somali sheep, and

dromedary camels. This is due to the largely pastoralist nature of Somali livelihoods. Endemic fauna, such as wild mammals, has largely been diminished through poaching. Giraffes, zebras, and hyenas can still be found. Other endemic mammals include the long naked garanuug (*Litocranius walleri*) and the silver dik-dik (*Madoqua piacentinii*) and the golden mole (*Calcochloris tytonis*). Reptile species found in Lower Shabelle, as in Somalia generally, include puff adder snake (*Bitis arietans Somalica*). Bird species include the ostrich and doves.

3.3. Socio-economic Environment

Population: Barawe is a coastal and port town about 200km south of Mogadishu, in the southwestern Lower Shabelle region. Barawe is the designated administrative capital of the South West State. Barawe has an estimated population of 74,072. 65 percent out of this figure are rural or nomadic people, 16.6 are urban, and 18.4 are Internally Displaced Persons (IDPs). The town's traditional inhabitants are of the Tunni clan, a sub-group of the Rahanweyn.

Livelihoods: Barawe is one of the oldest towns in Somalia, and its livelihoods are mainly based on the resources of the Indian Ocean. The main economic activities include: fishing, trading (serving the hinterlands for supplies), and it serves as a market for the agro-pastoral communities living on the outskirts of town along the Shabelle River. Agriculture, aid, management of infrastructure and telecommunication services and money transfer have also been part of the region's economic sectors.

Administration and Governance: Barawe town has a mayor, and Barawe District has a District Commissioner and a district council, the latter was elected and consists of 27 seats. In 2009 it became one of the strongholds of Al-Shabaab fighters, but they were ousted by the Somali National Army and their ally the African Union troops.

Health and Education: The entire district only has 5 primary schools, which is not sufficient to service all age-relevant children. Two of them also serve as secondary schools, including the Barawe Secondary School. Barawe town further hosts the Barawe International University, which is a community private university. Furthermore, it has four hospitals, including the Barawe General Hospital, and a Mother and Child Health Care Center. Life expectancy in Lower Shabelle is 49.9 years.¹⁰ Common diseases in Lower Shabelle are Malaria, Bilhazias, AWD, Cholera and measles.¹¹

Gender-Based Violence: It is difficult identifying GBV-related data that is specific to the region. GBV-related information is underreported or generally not shared. Numbers for the nearby

¹⁰ Life Expectancy at Birth, Global Data Lab, accessed at: <https://globaldatalab.org/areadata/table/lifexp/SOM/>

¹¹ Mubarak Community Development Organization, WASH Assessment in Awdhegale District, Lower Shabelle Region, accessed at: <https://www.humanitarianresponse.info/sites/www.humanitarianresponse.info/files/documents/files/WASH%20Assessment%20in%20Awdhegale%20District%20of%20Lower%20Shabelle%20Region.pdf>

Afgooye indicate 5-10 percent of women report on non-partner violence, and 40-50 percent report intimate partner violence.

Conflict: Barawe and the Lower Shabelle region have seen decades of conflict-related violence, natural disasters, economic exclusion and forced displacement. UNOCHA identified 624,000 people in need of humanitarian assistance in Lower Shabelle, with 206,000 in 'severe' and 87,000 in 'extreme' situations of vulnerability. Barawe was thereby one of the hardest hit districts.¹²

IDP Population: There are 10 IDP camps in Barawe town and in neighbouring Galbed. IDPs are mostly from the Lower Shabelle region, and have been escaping Al Shabaab occupation. As of October 2021, the 10 sites host 1,559 households or 11,470 individuals. 55 percent of IDPs are female and 45 percent male. 5 percent of IDPs are Persons living with Disabilities. In contrast to other IDP camps in the country, there is no eviction risk at these sites. 90 percent of the sites are built on communally owned land.¹³

4. Project Description

The medium-term flood recovery component, under the SCRPs 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.

Engineers from UNOPS conducted a reconnaissance site visit and out of five roads that were under consideration for rehabilitation, the community emphasised the Imbereso Road as the most affected as it is not passable during the rains. In addition, the road connects farming rural areas to the markets in Barawe and Imbereso and thus fits the criteria set out by the Client for prioritisation of roads.

Imbereso Road is the main access road connecting the town to the Mogadishu -Kismayo Interstate Road. The road starts from town and heads northwest to join the Mogadishu Kismayo Road at Imbereso village. The road extends 2.5 km along the Mogadishu-Kismayo Road to the Airport. The community prioritised this road as it is the only supply route into town. When it rains, the town is cut-off completely and the villagers are unable to access the town.

A team comprising a Road Engineer and support staff conducted an assessment mission to assess the condition of the roads, identify the causes of damage and possible solutions for rehabilitation. The team visited Barawe on 15th March 2021 and assessed roads and infrastructure over a period of 3 days. Imbereso is a 9 m wide, originally paved road with a gravel base and about 25mm

¹² UNOCHA, 2019, Humanitarian Needs Overview Somalia 2020.

¹³ CCCM Cluster Somalia, Verified Sites in Barawe as of October 2021, accessed at: <https://data.unhcr.org/en/documents/details/89247>

bitumen surfacing. The pavement however is deteriorated and completely failed due to erosion and lack of maintenance for many years. Most sections of the road pavement have been washed, leaving deep potholes. Drivers are forced to drive outside the carriageway to avoid the rough riding surface.

The road has three distinct sections: -Town (urban) section; rural with sloping (rolling section), and a rural section in flat terrain. The first 1.9 km is an urban section that cuts across the town. The pavement on this section has completely failed and is washed out leaving an earth road. There are sections with some remnant line drains. Another section of the road that passes through an urban setting is between Km 5+300 - Km 6+200. This section passes through Imbreso town, a farming center located North East of Barawe.



Figure 9 Road section through the town Station 0+140



Figure 10 Road section through the town Station 0+060

Station 1+900 to 2+800 runs up a rolling terrain. This is the most flood-affected section with deep gullies at several locations. During the rains, this section is frequently cut-off. Emergency repairs/diversions have previously been done by AMISOM (African Union Mission to Somalia) troops. The natural soil at this section is deep silty sand which is easily dispersed and washed away by flood waters. The most affected locations are cross culvert locations where outfalls have been washed out and developed into deep gullies. The road has been undermined at these locations, leading to total collapse across the road width. Lined drains had been constructed at the steep slopes together with scour checks but were damaged and washed away.



Figure 11 Road section washout at culvert outfall location

The sections between Stn 2+800 - Stn 5+300 and Stn 6+200 - Stn 8+395 traverse a rolling and flat terrain. Similarly, at this section, the road pavement has totally failed. There are huge potholes all along the road.



Figure 12 showing a section of the road with pronounced down cutting on the road surface. Note the lack of a side drain

4.1 Project Selection

Imbereso Road meets criteria set out for C2 projects in the Project Appraisal Document (PAD) as explained below:

- The road is damaged by local drainage flooding and impassable during the rainy seasons. The flooding caused by failure of drainage systems - side drains, outfall drains, protection works along the road.
- The inclusion of Imbereso road under C2 support has been requested by the State and the local administrations and supported during the local community consultation process
- The road 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..
 - 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. The road will be constructed as a gravel road with exception of an 800m section which will have a concrete base layer and finishing.

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. A section of the road, about 800m in length will have a concrete layer, of 100mm depth. This section is very steep – 10% grade and the concrete finish is provided as to reduce erosion and formation of gulleys along the road as well as for safety reasons. The skid resistance of gravel is low and increases the risk of accidents on road sections with high grades.

The proposed road will be at least 9m wide consisting of 6m carriageway and 2m shoulders, one on either side and side drains. On sections where the side drain is on both sides of the road, the overall width may be up to 11m. The existing road is 9m and as such the width will be retained for most parts. There is sufficient right of way for sections with a wider cross-section.

There are no major drainage channels – rivers, streams, and therefore no major drainage structures involved. However, the given the hilly terrain of a section that the road traverses combined with the nature of soils (loose clayey gravels and silts), the risk of erosion is very high. At present, huge gulleys have been formed especially at the outlets of cross culverts. The road is also severely damaged as a result of uncontrolled erosion.

The design has provided the following to mitigate against further erosion and to ensure sustainability of the investment:

- Lining of drains – the drains on the steep section and outfall drains are lined with concrete and stonepitching to prevent scouring.
- Gabions – gabion retaining walls have been provided as a means of slope protection and gulley reclamation
- Scour checks – these are provided along the side drains at specified intervals to reduce scouring
- Riprap – to be laid at cross culvert outlets as well as in the gulleys to reduce scouring at the bottom.
- Vegetation – planting of indigenous trees and grasses is provided in the design as a means of erosion protection.
- Cross culverts are provided at appropriate locations.

The figures below illustrate some of the above listed intervention measures

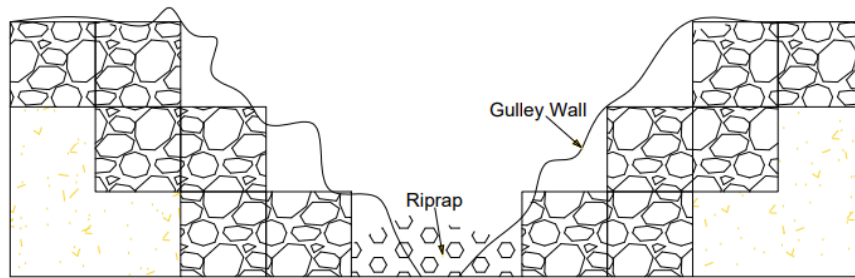


Figure 13 Gully Protection Works

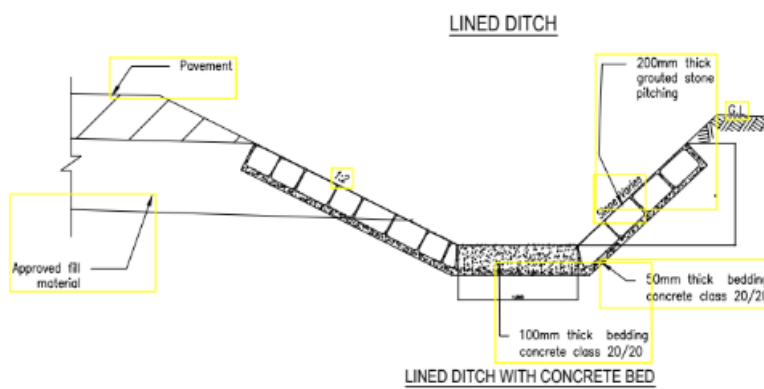


Figure 14 Lined Ditch

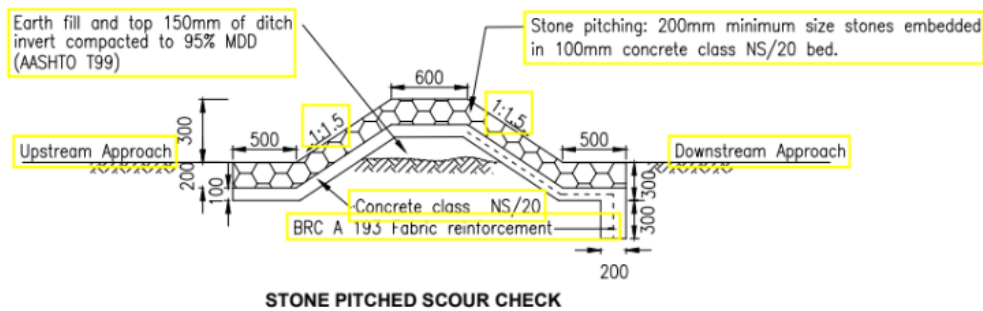


Figure 15 Scour Check on drains

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 Barawe. The

team visited Barawe in March 2021 and assessed roads and infrastructure. This was a follow-up assessment after the initial reconnaissance assessment made by the advance team in February 2021.

- 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.

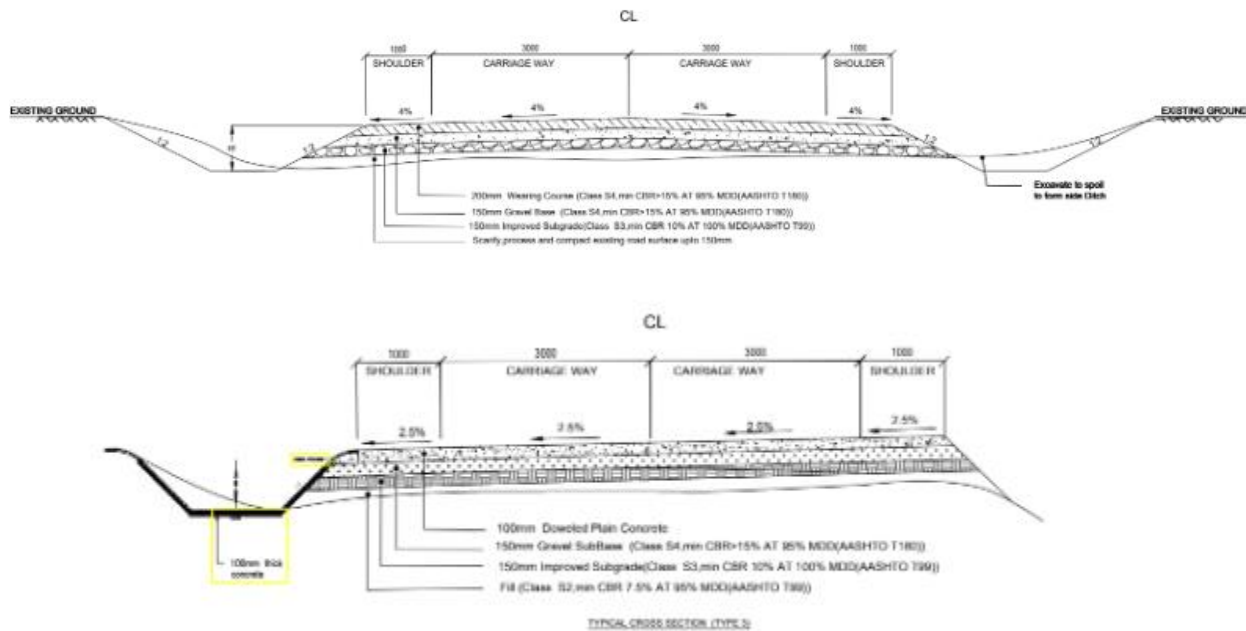


Figure 16 Cross Section Assignment Barawe Roads

- 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.

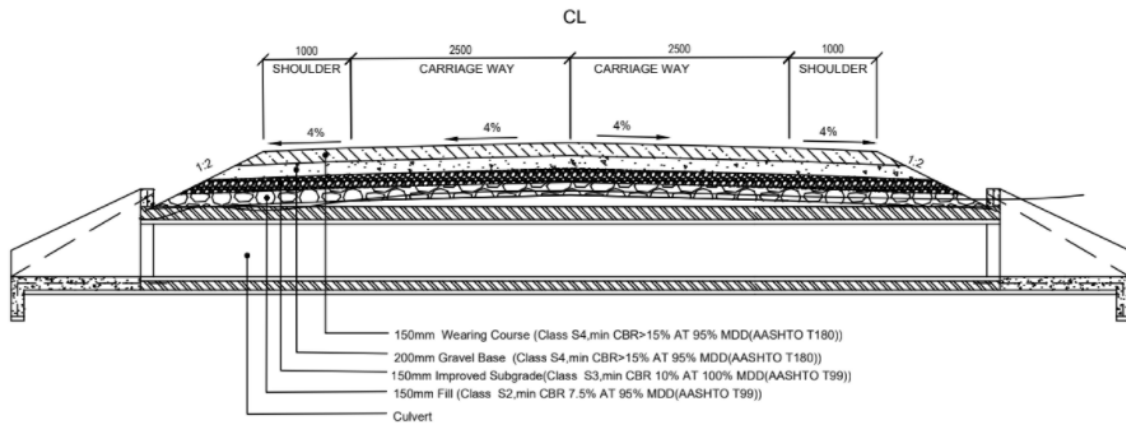


Figure 17 Typical cross-section of a cross-culvert

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:
 - 100mm Doweled mass concrete base (800m length)
 - 200mm Wearing course
 - 150mm Gravel Base course
 - 150mm Improved Subgrade

- Scarifying, processing and adding suitable material where necessary to form the lower subgrade
- 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
2.	Surveyor	1	Skilled
3.	Site Engineer	1	Skilled
4.	Environmental and Social Safeguards Specialist	1	Skilled
5.	Materials Technician	1	Skilled
6.	Construction Foreman – Earth Works and Pavement Layers	1	Skilled
7.	Mechanic	1	Skilled
8.	Site Administrator	1	Skilled

9.	Casual labour	20	Unskilled
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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 for hard rock was identified and representative samples were subjected to laboratory testing to assess their suitability for use construction. However, the Contractor is not under any obligation to source material from this site. The Contractor will select material sites upon mobilisation.

5. Environmental and Social Risks and Impacts

This section lists the anticipated positive and adverse impacts associated with the Imbereso Road rehabilitation subproject.

5.1 Positive Impacts

- The rehabilitation of Imbereso Road as per the new design with provisions 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,
 - Community health and safety risk: traffic safety, water and sanitation safety, life and fire safety, protection from COVID-19.
 - Risk of floods.
 - Social conflict related to selection of road that may exclude some groups
 - Child labor and forced labor, including for the resourcing of materials
 - Risks of GBV/SEA/SH
 - Risks of spread of communicable diseases
 - Near complete lack of environmental legislation in Somalia
 - Lack of capacity of the Government to monitor and implement environmental risk mitigation and protection

There are no land or resettlement related issues anticipated, as no additional land is required, and no street vendors are operating along the roadside. Accessibility to houses during the construction is guaranteed through back roads.

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 Imbereso Road

WB ESF	E&S Risks and Impacts	Mitigation Measures	Responsibility	Budget mitigation (in USD)	Monitoring Indicator	Monitoring Frequency
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 to prepare local Security Management plan (SMP) - Contractor to prepare local Activity Security Plan - Implementation and compliance with SMP and local Activity Security Plan - Compliance with GBV/SEA/SH Action Plan	PIU / Contractor	Costs for security risk implementation	# District Security Risk Assessments # of Local Security Management Plans # of Local Activity Security Plans	Prior to commencement of activity
	Risk of labor and working conditions of all the workers don't comply with WB and Somali legislation	- 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

WB ESF	E&S Risks and Impacts	Mitigation Measures	Responsibility	Budget mitigation for (in USD)	Monitoring Indicator	Monitoring Frequency
	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 • 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	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 been subjected to medical surveillance # of site speed limit signs at construction site # of rest and stretching breaks per work day % of workers with appropriate PPE # of trainings held for workers	monthly

WB ESF	E&S Risks and Impacts	Mitigation Measures	Responsibility	Budget mitigation for (in USD)	Monitoring Indicator	Monitoring Frequency
		• Incorporate rest and stretching breaks into work processes and conduct job rotation • Implement quality control and maintenance programs that reduce unnecessary forces and exertions • Provision of PPE • Provision of regular training of workers on workplace safety • Preparation of health and safety plan			# of health and safety training plan in place	
	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 • Implement GBV/SEA/SH Action Plan • Workers training on GBV	Contractor	Incl in contractor staff costs	% of workers that signed COCs # of workers' training sessions	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 women Signed COCs % of workers are women	At start of project

WB ESF	E&S Risks and Impacts	Mitigation Measures	Responsibility	Budget mitigation (in USD)	for Monitoring Indicator	Monitoring Frequency
	Risk of delayed payment or underpayment of workers, leading to complaints and conflict	- Ensure provision of timely payment - Ensure provision of GRM - Ensure workers are made aware of 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 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 # of child and forced labor reported	Throughout project implementation Regular inspections
	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	Contractor	Contractor's budget	# of regular reviews conducted # of grievances logged # of fire drills conducted	Monthly

WB ESF	E&S Risks and Impacts	Mitigation Measures	Responsibility	Budget mitigation (in USD)	Monitoring Indicator	Monitoring Frequency
		jackets, overalls and dust coats. • GRM in place • Regular fire drills • Preparation of an Emergency Preparedness Plan and emergency alert systems			EPP in place	
	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
	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)	Contractor	1,000 USD for logistics	# of H&S Training session	At the beginning of construction activity

WB ESF	E&S Risks and Impacts	Mitigation Measures	Responsibility	Budget mitigation (in USD)	for Monitoring Indicator	Monitoring Frequency
		Raise awareness to the workforce regarding the implementation of the ESMP tailored to the project scope, through toolbox talks and other platforms			# of awareness raising session	
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)¹⁴, such as: - Substitute raw materials or inputs with less hazardous or toxic materials - Institute good housekeeping and operating practices - including inventory	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

¹⁴ 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)	for Monitoring Indicator	Monitoring Frequency
		control to reduce the amount waste • Institute procurement measures that recognize 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 • 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				

WB ESF	E&S Risks and Impacts	Mitigation Measures	Responsibility	Budget mitigation (in USD)	for Monitoring Indicator	Monitoring Frequency
		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	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)	for Monitoring Indicator	Monitoring Frequency
		when site work is complete. - Do not allow site workers to defecate in the open anywhere on the site or in its vicinity. - Add the use of sanitation arrangements in toolbox talks			# of 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	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
		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				
	New Material sites and borrow pits	• Once material sites and borrow pits are identified and selected by the contractor, 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.	PIU/Contractor	5000USD	Availability of adequate E&S plan that includes rehabilitation for management of new quarries and borrow pits in place	Before activity commencement

WB ESF	E&S Risks and Impacts	Mitigation Measures	Responsibility	Budget mitigation (in USD)	for Monitoring Indicator	Monitoring Frequency
		- 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				
Operational Phase						
	Risk of soil erosion	- Mulching to stabilize exposed areas (re)-vegetation of soil areas	Contractor	3000 USD	% of soil areas have been vegetated	After finalization of construction
ESS 4: Community Health and Safety						
ESS 4	Construction Phase					
	Risk of increased GBV/SEAH cases and risks of sexual exploitation and abuse or sexual harassment, such as requests for sexual favors by project workers	- Implementation and monitoring of GBV / SEA Action Plan - GBV awareness sessions for community - GBV awareness sessions for workers. Engage a dedicated	PIU	Incl in PIU staff and travel costs	Activities under GBV/SEA Action Plan implemented # of GBV awareness sessions	monthly

WB ESF	E&S Risks and Impacts	Mitigation Measures	Responsibility	Budget mitigation (in USD)	for Monitoring Indicator	Monitoring Frequency
		specialist to support oversight and management of these risks Workers to sign COC			# 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 % or works with access to face masks and sanitizer	monthly

WB ESF	E&S Risks and Impacts	Mitigation Measures	Responsibility	Budget mitigation (in USD)	for Monitoring Indicator	Monitoring Frequency
	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 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	Contractor	Inc in Contractor budget	# of sensitization measures for communities # 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	At commencement of activity
	Risk of traffic and road safety	• Safety/warning signage, safety barrier	Contractor	Inc in Contractor budget	# of signage	monthly

WB ESF	E&S Risks and Impacts	Mitigation Measures	Responsibility	Budget mitigation for (in USD)	Monitoring Indicator	Monitoring Frequency
		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.			# of toolbox talks that include road safety issues % of drivers that are properly licensed # of Driver rosters # of maintenance logs for vehicles	
	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	Contractor	Inc in Contractor budget	% of vehicles well maintained % of engine exhausts with mufflers installed % of activities implemented during the days	Throughout project implementation

WB ESF	E&S Risks and Impacts	Mitigation Measures	Responsibility	Budget mitigation (in USD)	for Monitoring Indicator	Monitoring Frequency
		• 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.				
Operational Phase						

WB ESF	E&S Risks and Impacts	Mitigation Measures	Responsibility	Budget mitigation (in USD)	for Monitoring Indicator	Monitoring Frequency
	Road traffic safety risk ¹⁵ 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 8: Cultural Heritage						
	Risk of Chance Finds	Implement Chance Find procedures	Contractor		Chance find procedures are implemented	monthly
ESS 10: Stakeholder Engagement and Information Disclosure						
ESS 10	Preparation and Construction Phase					
	Risks of poor access to beneficiaries lead to less meaningful community engagements and difficulty in monitoring for social harm	- Implementation of GRM - Monitoring of GRM solutions in a timely manner - Use site-specific incident logs - Implementation of SEP	PIU	PIU GRM costs	% of complaints filed have been addressed # of site-specific incident logs	monthly
	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
	Access to beneficiaries for meaningful stakeholder and community engagements as	- Implement SEP - Implement and create awareness of GRM	SPT / PIU	Included in PIU staff costs	# of GRM cases filed	at the beginning of activity and

¹⁵ WB Good Practice Note on Road Safety

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

WB ESF	E&S Risks and Impacts	Mitigation Measures	Responsibility	Budget mitigation (in USD)	for Monitoring Indicator	Monitoring Frequency
	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)			Travel costs: 2,000	# of stakeholder engagements conducted	throughout implementation

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 relevant 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 GBV Specialist, the Security Specialist, the Stakeholder Consultation Specialist and the GRM Specialist will contribute to the monitoring of their respective fields. The Security Specialist, in particular, will be responsible for the implementation of the SMP; and the GBV Specialist for the implementation of the GBV/SEA/SH Action Plan. The PIU's E&S team will be responsible for the monitoring of the implementation of the ESMP. 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 E&S 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
- 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 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 Environmental and Social Monitoring 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 • 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
3	Incidents Reporting	Report on incidents and accidents provide root cause analysis	Monthly, with severe incidents within 48 hours	Contractor / 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 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.

Next to the training of workers, communities at the site will receive awareness raising sessions on the following topics:

- heighten awareness of environmental and social risks and impacts and mitigation measures including trainings on (not exhaustive):
- Communicable diseases/HIV-AIDS/STI/GBV awareness and prevention
- Community grievance redress mechanism
- Road Safety Awareness

In addition, continuous E&S training has been provided to the PIU team as well as to the SPTs, in all E&S aspects of the Project.

10. Stakeholder Consultations

District Administration: On 15th of February 2021 the PIU-UNOPS assessment and consultation mission team met with the district administration in Barawe to discuss the health facilities/sites/roads identified through prioritization activities with the SWS Ministry of Planning and relevant ministries (which took place in Baidoa in mid-October 2020). The PIU representative and UNOPS engineers informed the district administration of the key objectives of the assessment mission which the administration welcomed and pledged to assist in any way possible.

The district administration emphasized the need for extensive constructions of roads in Barawe and health facility assistance, as they say they feel abandoned by the SWS government and stated that they need urgent rehabilitation within the city.

The district administration spoke of the general needs of the district and emphasized the state of the destroyed roads, which has caused difficulties for vehicles and pedestrians when travelling. The administration stated that the cause for these destroyed roads is recurrent flash floods that are due to the downstream of rain-water/rain-falls from hills surrounding the city. The district administration requested that 5 roads in the district be rehabilitated/reconstructed which are: Imbreeso road, Port road, Biimaalow Road, Daaraley road and Kaabada road. The district administration emphasized the importance of these roads to the population of Barawe, as they connect several villages/towns.

Community members: On the 16th of February, the PIU-UNOPS and relevant Ministries – MoPWR & MoEWR held an inclusive consultation with the communities of Barawe District. In total, 41 community members were consulted, including 9 youth representatives, 4 IDP representatives, 11 elders and 2 representatives from minority groups. Initially, the community stated that they feel abandoned by the SWS government and do get necessary provisions as other regions and districts in the State. The team responded, that the Project is here to cater for the district's development.

The elders informed the team that the main need and priority in the district is the re-construction of roads leading into the district, they specifically highlighted the **Imbreeso Road**, which is the main inter-linkage road that links the city to the districts outskirts and further on to other major cities such as Kismayo and Mogadishu. They also stated that there were two culverts along the Imbreeso Road that have been destroyed by the recurrent flash floods. The Project team responded that road rehabilitation would be eligible under the project.

The religious scholars in the Barawe District stated that the biggest dilemma in Barawe is the downstream rain water from hills that causes recurrent flash floods, which floods roads, houses and villages. These cause schools to shut along with mosques and health facilities. The Project team explained that activities to respond to flood damage are eligible, but also that the project takes a higher level approach to respond to flood risks.

The youth of the district stated that they are pleased to hear about the SCRP and its interventions on roads as that is an opportunity for employment to them and they requested that the local companies be given prioritization and employment opportunities for the youth. The Project team assured that recruitment of local workers will be included in the procurement documents.

The IDP community in Barawe stated that they had been displaced by war and that since they've arrived in Barawe they haven't been given any assistance and they are marginalized alongside minority groups in the district. Both IDPs and minority groups are frowned down upon in society in Barawe and are not given equal opportunities in the district - whether it be decision making or employment opportunities. Both communities said that when heavy rains come and flash floods occur, their homes are damaged/destroyed. The project team responded that the project cannot rehabilitate individual houses, but that community infrastructure rehabilitation can benefit the whole community.



Figure 18 Community meeting in Barawe



Figure 19 Focus Group Discussion with village elders 2021

KII with village women Barawe 16th March

Once the rehabilitation of Imbereso Road 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 5 Stakeholder consultation records

Date	Type of Consultation	Stakeholders Consulted	Issues discussed
15 th – 18 th March 2021	Stakeholder consultation and initial roads assessment visit to Hudur.	Regional commissioner, Ministry of Public Works, District Commisioner, Barawe, IDPs, youth and women's representatives, community elders, business people and religious leaders	Flood risk to the community Prioritization of infrastructure for rehabilitation works Security assessment and accessibility Beneficiaries' community - potential impact of reconstruction of the roads.
15 th – 18 th March 2021	Technical Assessment of Barawe Roads by UNOPS Road Engineer	Regional commissioner, Ministry of Public Works, District Commisioner, Barawe.	1- road damage assessment 2- priority areas. 3- level of road accessibility. 4 context and environmental and safeguard issues. 5- Social impacts and priorities.
18 th – 21 st October 2021	Geotechnical and topographical data collection of Barawe Roads roads by UNOPS Material Engineer & Surveyors	Regional commissioner, Ministry of Public Works, District Commisioner, Barawe.	Purpose of the Geotechnical and topographical data collection and the schedule
18 th -21 st December 2021	UNOPS Drainage Engineer assessment field visit to Barawe	Regional commissioner, Ministry of Public Works, District Commisioner, Barawe	Assessment of drainage system to incorporate to the design.

Date	Type of Consultation	Stakeholders Consulted	Issues discussed
June 2022	Client Review: Technical Review of the Detailed Design Review (via email)	Project Coordinator – SPT, South West State	Ongoing.
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	Review waived

11. Grievance Redress Mechanisms

Under the new World Bank ESSs, Bank-supported projects are required to facilitate mechanisms that address concerns and grievances that arise in connection with a project.¹⁶ 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’.¹⁷ 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 ESMF¹⁸).

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.

¹⁶ 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.

¹⁷ World Bank, Environmental and Social Framework, 2018, p. 131.

¹⁸ 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

12. Implementation Budget

Table 6 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 +tdb
	TOTAL	27 000

13. Conclusions

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

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Annex 1: Community Consultations



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

Date: 16 February 2021

Subject: Attendance Sheet Field Mission Barawe

No	Name	Title	Telephone
1	Ali Bare Shug	Agasimsha madaxtooyada	0618848130
2	Xamza Ali Siidow	Xamza Siidow	0615359152
3	Caadiir Maxamed Aweys	Dhalinyaro	0616777783
4	MUSTAFA Nour ALI	Youth	0617030777
5	Adis Maxamed C/qaadir	Youth	0615109789
6	Alaa Ali Cabdi Xaaji	Youth	0618167896
7	Zakaria Maxamed Maxamed	Youth	061567583
8	Abdullahi Yusuf Ibrahim	Youth	0617661202
9	Adnan Sheikh Noor Cadaan	Youth	061828803
10	Sadiq Ali Cabdi	Urta ka dhaxlitaanka	0613506264
11	Ismaaciil Xuseen Mahamed	Youth	0617485142
12	Adnan Abdulqadir Sadiq	U/Haweenka	0615795833
13	Adnan Abdulqadir Sadiq	U/Haweenka	0615741518
14	Adnan Abdulqadir Sadiq	U/Haweenka	0617020235
15	Adnan Abdulqadir Sadiq	U/Haweenka	0618152695
16	Maasida Xuseen Abdullahi	U/Haweenka	0613193443
17	Khadga Mahied Omar	U/Haweenka	0619345786
18	Fadumo Abdirahman Fiqi	U/Haweenka	0616922931

19	Abdirahman Osman Aden	U/Barakaysiga	0616235614
20	Hassan Abdulkadir Aden	IDPS	0616788461
21	Abdulkadir Ahmed A/kadir	IDPS	0616444689
22	Nur Ali Nur	IDPS	0614341721
23	Abdullahi Husein Aden	oday dhagay / wabadaan	0615393753
24	Abdi Mahied Sabrye	Nabadaan	0615578594
25	Abdi Nur Abdulkadir Aden	Nabadaan	0616738279
26	Mahied Abdulle Osman	Nabadaan	0615373021
27	Mahied Abdi Abdulkadir	Nabadaan	0615291601
29	Abdirahman Mahied Nur	Nabadaan	0615541315
30	Husein Ali Omar	Nabadaan	0615536075
31	Abdulkadir Abdow Husein	Nabadaan	0613192849
32	Adnan Mahied Abdi	Nabadaan	0615259711
33	Maxamed Nur Aden	Nabadaan	0615216476
34	Abukar Omar Mahied Aden	Nabadaan	0617411791
35	Mahied Ahmed Hassan	Nabadaan	0616352734
36	Mahied shug Aden Osman	markamada	06158899352
37	Abdulkadir shug Ali Omar	oday	0615397267
38	Maxamed C/qaadir Fiqi	markamada	0615312077
39	Mamino Ali Husein	IDP	0618851936
40	Ali Mohamed Gabow	Minority groups	0618563644
41	Maxamed Aden Mahied	Minority groups	0616073061
42			

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 specific GRM, 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 7 Types of Complaints expected

Categories of Grievances
<i>1. Basic information</i>
- Access to information
- Correction and deletion of untrue or misleading information that affects the person
<i>2. Ethics and conduct</i>
- Government entities and staff
- Implementing Partner staff
<i>4. Violation and breach of codes of ethics</i>
- 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
<i>5. Violation of human rights and fundamental freedoms</i>
- 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
<i>6. Corruption and Economic crimes</i>

- 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.¹⁹ They should be manned by the IP staff, especially its community project facilitators, in close coordination with local authorities. At the help desk, PAPs can inquire about information in regard to project activities, or they can file a grievance directly with the person manning the desk. Grievances can be filed in writing or verbally at the Help Desk.

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

¹⁹ The help desk must be budgeted by the IP, the manning of the help desk will depend on the nature of the activity

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'). 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 8 GRM Actions

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

Step 5: Monitor, Evaluate and Provide Feedback

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

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

Response Times

Table 9 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

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 lists all the above mentioned risks and impacts, mitigation measures, indicators, responsibilities, monitoring frequency. 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

WB ESF	E&S Risks and Impacts	Mitigation Measures	Responsibility	Monitoring Indicator	Monitoring Frequency	Findings / Observations	Corrective Actions
	Risk of Insecurity of all project workers	- Project Implementation unit (PIU) to prepare District Security Risk Assessment - PIU to prepare local Security Management plan (SMP) - Contractor to prepare local Activity Security Plan - Implementation and compliance with SMP and local Activity Security Plan - Compliance with GBV/SEA/SH Action Plan	PIU / Contractor	# District Security Risk Assessments # of Local Security Management Plans # of Local Activity Security Plans	Prior to commencement of activity		
	Risk of labor and working conditions of all the workers don't comply with WB and Somali legislation	- 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	Availability of register Availability of log book showing site visited and actions taken	monthly		

WB ESF	E&S Risks and Impacts	Mitigation Measures	Responsibility	Monitoring Indicator	Monitoring Frequency	Findings / Observations	Corrective Actions
	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 • 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 • Provision of PPE	Contractor	% 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 been subjected to medical surveillance # of site speed limit signs at construction site # of rest and stretching breaks per work day % of workers with appropriate PPE # of trainings held for workers # of health and safety training plan in place	monthly		

WB ESF	E&S Risks and Impacts	Mitigation Measures	Responsibility	Monitoring Indicator	Monitoring Frequency	Findings / Observations	Corrective Actions
		- Provision of regular training of workers on workplace safety - Preparation of health and safety plan					
	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 - Implement GBV/SEA/SH Action Plan - Workers training on GBV	Contractor	% of workers that signed COCs # of workers' training sessions	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	# of job announcements made to women Signed COCs % of workers are women	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 GRM - Ensure workers are made aware of GRM	Contractor	# 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 GRM to ensure their voices / complaints are heard - Contractor to maintain staff records, ID copies	Contractor	% of payments made on time # of workers' grievances filed # of GRM cases filed # of child and forced labor reported	Throughout project implementation Regular inspections		

WB ESF	E&S Risks and Impacts	Mitigation Measures	Responsibility	Monitoring Indicator	Monitoring Frequency	Findings / Observations	Corrective Actions
	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	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. - GRM in place - Regular fire drills - Preparation of an Emergency Preparedness Plan and emergency alert systems	Contractor	# of regular reviews conducted # of grievances logged # of fire drills conducted EPP in place	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	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	Monitoring Indicator	Monitoring Frequency	Findings / Observations	Corrective Actions
		Regular maintenance of vehicles and use of manufacturer approved parts to minimize potentially serious accidents caused by equipment malfunction.					
	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	# of H&S Training session # of awareness raising session	At the beginning of construction activity		
	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), 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	Contractor	# 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		

WB ESF	E&S Risks and Impacts	Mitigation Measures	Responsibility	Monitoring Indicator	Monitoring Frequency	Findings / Observations	Corrective Actions
		- Identify potentially recyclable materials - Disposal at permitted facilities specially designed to receive waste - 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.	Contractor	# of water closet toilet facilities available % of toilets leaking Toilets are well maintained	monthly		

WB ESF	E&S Risks and Impacts	Mitigation Measures	Responsibility	Monitoring Indicator	Monitoring Frequency	Findings / Observations	Corrective Actions
		• Provide proper earth pit latrines at all work sites where work will be undertaken for periods of up to one month. • Fill the latrines in once they become full and when site work is complete. • Do not allow site workers to defecate in the open anywhere on the site or in its vicinity. • Add the use of sanitation arrangements in toolbox talks		# of latrines provided % of latrines filled # 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	Contractor	# 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	Monitoring Indicator	Monitoring Frequency	Findings / Observations	Corrective Actions
		• 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					
	New Material sites and borrow pits	• Once material sites and borrow pits are identified and selected by the contractor, 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/Contractor	Availability of adequate E&S plan that includes rehabilitation for management of new quarries and borrow pits in place	Before activity commencement		

WB ESF	E&S Risks and Impacts	Mitigation Measures	Responsibility	Monitoring Indicator	Monitoring Frequency	Findings / Observations	Corrective Actions
	Risk of soil erosion	- Mulching to stabilize exposed areas (re)-vegetation of soil areas	Contractor	% of soil areas have been vegetated	After finalization of construction		
ESS 4	Risk of increased GBV/SEAH cases and risks of sexual exploitation and abuse or sexual harassment, such as requests for sexual favors by project workers	- Implementation and monitoring of GBV / SEA Action Plan - GBV awareness sessions for community - GBV awareness sessions for workers. Engage a dedicated specialist to support oversight and management of these risks - Workers to sign COC	PIU	Activities under GBV/SEA Action Plan implemented # of GBV awareness sessions # of sessions # of specialists engagement % of workers that have signed CoC	monthly		
	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.	PIU	# of community sensitization % of workers that have signed CoC % of workers with access to face masks and sanitizer	monthly		

WB ESF	E&S Risks and Impacts	Mitigation Measures	Responsibility	Monitoring Indicator	Monitoring Frequency	Findings / Observations	Corrective Actions
		Regular sensitization on COVID 19 to ensure workers observe the social distancing especially when in the community and public places					
	Risk of floods	- Elevation - drainage	Contractor	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 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	Contractor	# of sensitization measures for communities # 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	At commencement of activity		
	Risk of traffic and road safety	Safety/warning signage, safety barrier around the construction site, and safe driving practices ()	Contractor	# of signage	monthly		

WB ESF	E&S Risks and Impacts	Mitigation Measures	Responsibility	Monitoring Indicator	Monitoring Frequency	Findings / Observations	Corrective Actions
		• 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.		# of toolbox talks that include road safety issues % of drivers that are properly licensed # of Driver rosters # of maintenance logs for vehicles			
	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	Contractor	% of vehicles well maintained % of engine exhausts with mufflers installed % of activities implemented during the days	Throughout project implementation		

WB ESF	E&S Risks and Impacts	Mitigation Measures	Responsibility	Monitoring Indicator	Monitoring Frequency	Findings / Observations	Corrective Actions
		- 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.					
	Road traffic safety risks and increased noise level from increase in traffic	- Install signage for speed control in front of settlements - Safety/warning signage, safety barrier,	Local Authorities	# of speed control signage # of safety/warning signs have been installed	throughout project implementation		
	Risk of Chance Finds	Implement Chance Find procedures	Contractor	Chance find procedures are implemented	monthly		
	Risks of poor access to beneficiaries lead to less meaningful community engagements and difficulty in monitoring for social harm	- Implementation of GRM - Monitoring of GRM solutions in a timely manner - Use site-specific incident logs - Implementation of SEP	PIU	% of complaints filed have been addressed # of site-specific incident logs	monthly		
	Risks of lack of information on access to GRM leads to lack of accountability	Awareness raising on GRM	PIU	# of awareness sessions of GRM	quarterly		
	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	- Implement SEP - Implement and create awareness of GRM	SPT / PIU	# of GRM cases filed # of stakeholder engagements conducted	at the beginning of activity and throughout implementation		

WB ESF	E&S Risks and Impacts	Mitigation Measures	Responsibility	Monitoring Indicator	Monitoring Frequency	Findings / Observations	Corrective Actions
	floods. applies to preparation and construction phase)						

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.