Jamhuuriyadda Federaalka Soomaaliya
Wasaaradda Hawlaha Guud,
Dib-u-Dhiska iyo Guriyaynta
Xafiiska Agaasimaha Guud

جمـــــهورية الصّـومال الفيدراليـــــــة
وزارةالاشغال العام واعادة
الاعمار والإسكان
مكتب مذيرالــعـام

Somali Federal Republic
Ministry of Public Works, Reconstruction& Housing
Office of Director General

Ref: DG/MPWRH/ 278 / 2025

Date: 11 November 2025

Environmental and Social Impact Assessment (ESIA) Approval Form
Form Number: PAF-002

Project Title: Rehabilitation/Construction Of Revenue Collection Offices

Proponent/Implementing Agency: Ministry of Finance, Federal Republic of Somalia
Funding Entity: African Development Bank: Institutional Support for Economic Governance Project (ISEGP)
Title Description: The proposed project entails:

- Construction of modern, purpose-built, two-storey revenue collection offices.

This project seeks to develop facilities of major strategic importance, with the goal of decentralizing fiscal authority, resolving persistent infrastructure challenges faced by revenue authorities, and enhancing transparency and efficiency in taxpayer services.
Project Location: Dhusamareb (Galmudug State), Jowhar (Hirshabelle State), Kismayo (Jubbaland State), and Baidoa (South West State).
Consultant: Ecotech
Date of Submission: 7 October 2025

Review Summary
ESIA Report received and registered by the Ministry on: 21 October 2025
Completeness check conducted: Yes ☑ No ☐
Public consultations carried out: Yes ☑ ☐ No
Compliance with national laws: Yes ☑ ☐ No
Compliance with international safeguards: Yes ☑ No ☐

Recommended conditions:

- The detailed engineering design of the proposed the two-storey complexes in Kismayo, Dhusamareb, Jowhar, and Baidoa shall be submitted to the Department of Engineering for review and clearance prior to construction.
- The Contractor's Environmental and Social Management Plan (CESMP) must be prepared, reviewed, and formally approved by the Environment Department before commencement of demolition activities.
- An Occupational Health and Safety (OHS) Engineer shall be present on-site throughout the demolition process to ensure strict compliance with health and safety protocols.

Decision

☑ Approved
☐ Approved with Conditions
☐ Returned for Revision
☐ Not Approved

Checked By:

Name: Dr Yahya Y. Omar (BSc, MSc, PhD)
Title: Senior Environmental and Social Safeguards Specialist

Signature:

Date: 04 November 2025

Approved By:

11-11-2025

Mr. Farah Abdinur Ahmed
Director General
Ministry of Public Works, Reconstruction and Housing
Federal Government of Somalia

MINISTRY OF FINANCE
FEDERAL GOVERNMENT OF SOMALIA

CONSOLIDATED ENVIRONMENTAL & SOCIAL IMPACT ASSESSMENT REPORT

REHABILITATION/RENOVATION OF REVENUE COLLECTION OFFICES

October 2025


ECOTECH

ESIA ESMP REPORT FOR ENVIRONMENTAL ENGINEERING CONSULTING SERVICES FOR THE CONSTRUCTION OF THE PROPOSED REVENUE COLLECTION OFFICES FUNDED BY THE AFRICAN DEVELOPMENT BANK UNDER THE INSTITUTIONAL SUPPORT FOR ECONOMIC GOVERNANCE PROJECT (ISEGP).

RFP NO.: SO-RFP-ISEGP-QCBS-001-2024

TITLE	DESCRIPTION	REVISION
Date	October 7, 2025	00
Project Title	Proposed Revenue Collection Report	
Document Title	Consolidated ESIA ESMP Report	
Category	Environmental Engineering	
Prepared by	Erick Oloo	
Peer Reviewed by	John Kennedy	
Reviewed by	Justin Sure	
Reviewed & Approved by	Eng. Ahmed Kirish	
Designation	Project Director	
Signature		
Project number	31371 - 573	
Document reference	31371 - 573 - ESIA-ESMP - 001	
Remarks	For Review and Approval	

DECLARATION

I, the undersigned, hereby declare that this ESIA Study Report represents the facts about the proposed **Construction of the Revenue Collection Offices in Johwar, Baidoa, Kismayo and Dhuusamareb**, Somalia, by the Ministry of Finance.

DETAILS OF EXPERT WHO CONDUCTED THE ESIA

Erick Omondi Oloo, E & S Expert, NEMA

Sign:

Date: 7th October 2025

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1.1. ABBREVIATION AND ACRONYMS

AFDB	African Development Bank
AFDB ISS	AfDB Integrated Safeguards System
AFDB OS	AfDB Operational Safeguards
BMS	Building Management System
BRA	Banadir Regional Administration
CAE	Child Abuse/Exploitation
CBO	Community-Based Organization
CCTV	Closed-Circuit Television
COC	Codes of Conduct
C-ESMP	Contractor's Environmental and Social Management Plan
DECC	Directorate of Environment and Climate Change
DRM	Domestic Resource Mobilization
EA	Environmental Assessment
E&S	Environmental and Social
EHS	Environmental Health and Safety
EIA	Environmental Impact Assessment
ERP	Emergency Response Plan
ESAP	Environmental and Social Action Plan
ESIA	Environmental and Social Impact Assessment
ESIS	Environmental and Social Study
ESMMP	Environmental and Social Management and Monitoring Plan
FGS	Federal Government of Somalia
FMS	Federal Member State
FMSS	Federal Member States
GBV	Gender-Based Violence
GHG	Greenhouse Gas
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
HEPA	High Efficiency Particulate Air
HR	Human Resource
HVAC	Heating, Ventilation, and Air Conditioning

ICT	Information and Communication Technology
IEC	Information, Education and Communication
ISEGP	Institutional Support for Economic Governance Project
ISS	Integrated Safeguards System
MOECC	Ministry of Environment and Climate Change
MOF	Ministry of Finance
NGO	Non-Governmental Organization
NTP	National Transformation Plan
OHS	Occupational Health and Safety
OS	Operational Safeguard
PAPS	Project-Affected Persons
PAPS	Project Affected Persons
PDE	Project Delivery Entity
PIU	Project Implementation Unit
PIE	Project Implementation Entity
PIO	Public Information Officer
PPE	Personal Protective Equipment
PV	Photovoltaic
PWDS	Persons with Disabilities
RAP	Resettlement Action Plan
SDG	Sustainable Development Goal
SDGS	Sustainable Development Goals
SEA	Sexual Exploitation and Abuse
SEA/SH	Sexual Exploitation, Abuse and Sexual Harassment
SIA	Social Impact Assessment
SME	Small and Medium-sized Enterprise
SMS	Short Message Service
TB	Tuberculosis
TOR	Terms of Reference
VAC	Violence Against Children
VMGS	Vulnerable and Marginalized Groups
WASH	Water, Sanitation and Hygiene
WB	World Bank
WHO	World Health Organization

EXECUTIVE SUMMARY

A. OVERVIEW

Somalia is at a critical juncture in its state-building and economic recovery. A cornerstone of this transformation is enhancing Domestic Resource Mobilisation (DRM) to reduce aid dependency, finance development and strengthen governance legitimacy. The Institutional Support for Economic Governance Project (ISEGP), funded by the African Development Bank (AfDB), is a key initiative supporting this goal. A central component of the ISEGP is the construction of modern, well-equipped revenue collection offices in Dhuusamareb, Jowhar, Kismayo, Bossaso and Baidoa.

These facilities are of significant strategic value, aiming to decentralize fiscal authority, address long-standing infrastructure constraints for revenue authorities and improve transparency and efficiency in taxpayer services. The project is fully aligned with Somalia's National Transformation Plan (2025-2029) and global Sustainable Development Goals (SDGs) 8, 16, and 17.

However, the construction phase, though modest in scale, carries potential environmental and social risks, including dust, noise, waste generation and community disruption. To proactively manage these risks and ensure the project's sustainability, the conduct of this Environmental and Social Impact Assessment (ESIA) and the preparation of site-specific Environmental and Social Management Plans (ESMPs) are imperative.

1.1. Project Goal and ESIA Objectives

The overall goal of the ISEGP is to strengthen Somalia’s institutional capacity for effective domestic resource mobilization and public financial management by constructing modern revenue collection offices. This will enhance service delivery, improve fiscal accountability, and contribute to sustainable economic recovery.

The main objective of this ESIA is to identify, predict and evaluate the potential environmental and social impacts of constructing and operating these centers. It aims to develop robust ESMPs to ensure the project is implemented in a manner that is sustainable, inclusive and compliant with Somali law and AfDB safeguard policies. Specific objectives include establishing baseline conditions, proposing mitigation measures, ensuring regulatory compliance and promoting meaningful stakeholder engagement.

1.2. Rationale and Imperative for the ESIA

The ESIA is both a legal requirement under Somalia’s Environmental Management Act (2024) and a developmental necessity. It is a mandatory requirement of the AfDB’s Integrated Safeguards System, which sets clear standards for environmental and social assessment, stakeholder engagement and pollution prevention.

Beyond compliance, the ESIA process provides a structured framework for stakeholder engagement, helping to build trust, manage expectations and incorporate local knowledge into project design. This strengthens the project's legitimacy and long-term sustainability by ensuring it is environmentally responsible and socially acceptable.

1.3. Scope and Methodology of the Assessment

The scope of this ESIA covers all project phases, planning, site preparation, construction, operation, and decommissioning across all four sites. The assessment focuses on impacts related to air quality, noise, water resources, waste, community disruption, traffic and safety.

A participatory and evidence-based methodology was employed, combining:

- Desk Review: Analysis of project designs, national legislation, and AfDB safeguards.
- Field Observations: Direct assessment of site characteristics and surrounding environments.
- Stakeholder Engagement: Consultations with state officials, local communities, businesses, and other key groups.
- Impact Analysis: Qualitative assessment of potential impacts to determine their significance.
- ESMP Development: Creation of a practical plan with mitigation measures, roles, responsibilities, and monitoring frameworks.

1.4. Project Phases and Alternatives Considered

The project will proceed through five distinct phases:

1. Planning and Design
2. Site Preparation (including limited demolition in Jowhar, Baidoa, and Dhuusamareb)
3. Construction
4. Operation
5. Decommissioning (if applicable in the future)

Several alternatives were evaluated:

- **No Project Alternative:** Rejected as it would perpetuate current inefficiencies in revenue collection.
- **Alternative Sites and Designs:** Various options were reviewed with state authorities, with the selected sites and designs deemed the most practical, sustainable, and functional.
- **Proposed Project (Preferred Alternative):** The construction of the revenue offices was selected as the optimal choice to balance functionality, sustainability, and the delivery of significant institutional and socio-economic benefits.

B. PROJECT DESCRIPTION

1.1. Project Goal and Rationale

The project's primary goal is to strengthen Somalia's institutional capacity for effective domestic resource mobilization and public financial management. This will be achieved by constructing modern, purpose-built, two-storey revenue collection offices in four Federal Member State capitals: Dhuusamareb (Galmudug), Jowhar (Hirshabelle), Kismayo (Jubbaland), and Baidoa (South West State).

This initiative is a direct response to critical infrastructure deficits. Currently, revenue authorities operate from congested, inefficient and often rented premises that severely hinder staff productivity, secure record-keeping and the quality of public service delivery. The new facilities are designed to resolve these issues, providing a permanent, functional and secure base for revenue operations.

1.2. Project Locations and Site Context

All sites are strategically located on government-owned land within state capitals to maximize accessibility and integration with existing administrative functions:

- *Dhuusamareb, Galmudug*: Located at 5° 31′ 55″ N, 46° 22′ 55″ E within a central government compound shared with other ministries, creating a defined administrative precinct.
- *Jowhar, Hirshabelle*: Situated at 2° 46′ 17″ N, 45° 29′ 46″ E inside a key government compound housing multiple ministries, adjacent to the State House, requiring minimal disruption to high-level activities.
- *Kismayo, Jubbaland*: Positioned at 0°21′43″ S, 42°32′52″ E within the secure, walled compound of the Ministry of Finance, forming part of an established government cluster.
- *Baidoa, Southwest State*: Set at approximately 3° 6.995′ N, 43° 38.768′ E within a community setting, surrounded by residential houses and businesses, necessitating careful management of community relations during and after construction.

1.3. Key Project Components and Design

Each facility will be a two-storey complex designed for functionality, security, and sustainability. Standardized components across all sites include:

- **Functional Layout:** Work-pool offices and managerial spaces on lower floors, with five executive offices on upper floors.
- **Specialized Facilities:** Secure treasury safe rooms, public reception areas, and meeting/training rooms.
- **Robust Security:** Reinforced perimeter walls, four watchtowers, and on-site accommodation for security personnel.
- **Modern Services:** Electrical rooms on each floor, water and waste service ducts, lifts and comprehensive fire escape systems.
- **Sustainable Features:** Integration of rooftop **Solar Photovoltaic (PV) panels** to provide renewable energy, reducing long-term operational costs and environmental impact. Designs also prioritize natural lighting and universal accessibility.

1.4. Implementation Phases and Schedule

The project will be executed through a structured, four-phase approach over a 12-month construction period:

Pre-Construction: Involves final site investigations, securing permits, stakeholder engagement, and mobilization of contractors and resources.

Construction: The core phase, encompassing site preparation, substructure and superstructure works, building envelope completion, Mechanical, Electrical and Plumbing (MEP) installations, interior fit-out and external works (landscaping, parking, security walls).

Operation: Begins after commissioning and handover, involving the day-to-day use of the facilities for revenue collection, supported by routine maintenance, security monitoring, and waste management.

Decommissioning (Long-term): While not anticipated in the short term, provisions are made for the eventual safe demolition, material recycling, and site rehabilitation.

1.5. Workforce, Resources, and Management

Construction will be managed by a multidisciplinary team and is expected to employ over 50 workers per site at peak activity. A key social objective is to source at least 60% of the workforce locally to generate community benefits and foster goodwill.

Strict Occupational Health and Safety (OHS) protocols will be enforced, including worker induction training and the provision of on-site first-aid stations. The proximity of health facilities varies, necessitating specific measures like standby vehicles for sites in Dhuusamareb and Baidoa. Resource management plans for water, energy, and construction waste will be implemented to minimize environmental impact.

1.6. Anticipated Lifespan and Off-Site Support

The revenue offices are designed and will be constructed to high engineering standards for an anticipated lifespan of at least 50 years, subject to proper maintenance. Their successful operation will be supported by necessary off-site investments, including reliable connections to public utilities (power, water, telecom), potential minor upgrades to access roads and formal agreements with municipal services for ongoing waste collection.

C. POLICY, ADMINISTRATIVE AND LEGAL FRAMEWORK

1.1. Overarching Framework

The Revenue Collection Offices project is governed by a comprehensive legal and policy framework that integrates Somalia's national legislation, state-level regulations, and the African Development Bank's (AfDB) environmental and social safeguards. This multi-tiered structure ensures the project adheres to principles of environmental sustainability, social equity, and regulatory compliance, aligning with both national development goals and international best practices.

1.2. Core National Legal and Policy Instruments

The project is primarily guided by Somalia's foundational legal documents and policies:

- **Provisional Constitution (2012):** Guarantees the right to a clean and healthy environment and mandates public participation, forming the constitutional basis for the Environmental and Social Impact Assessment (ESIA).
- **Environmental Protection and Management Act (2024) & ESIA Regulations (2024):** Provide the legally binding requirement for this ESIA, establishing procedures for impact assessment, pollution control, and regulatory oversight by the Ministry of Environment and Climate Change (MoECC).
- **National Environmental Policy (2019) & National Climate Change Policy:** Emphasize sustainable development, the precautionary principle, and the integration of climate resilience into infrastructure projects, directly informing the project's design and mitigation measures.
- **National Development Plans (NTP & Infrastructure Strategy):** The project directly contributes to the goals of the National Transformation Plan (NTP) and the National Infrastructure Strategy by building resilient public infrastructure that enhances governance and economic recovery.

1.3. AfDB Safeguards and Project Categorization

As an AfDB-funded project, compliance with the bank's Integrated Safeguards System (ISS) is mandatory. The project has been categorized as Category 2, indicating localized and manageable environmental and social impacts. Key applicable Operational Safeguards include:

- *OS 1 (Environmental and Social Assessment)*: Mandates this ESIA to identify and manage impacts like dust, noise, and waste.
- *OS 3 (Biodiversity)*: Requires measures to protect urban ecosystems during construction.
- *OS 4 (Pollution Prevention)*: Guides the management of emissions, waste, and resource efficiency.
- *OS 5 (Labour Conditions)*: Ensures fair and safe working conditions for all construction workers.
- *OS 2 (Involuntary Resettlement)*: Is not triggered as all project sites are on government-owned land with no displacement required.

1.4. Institutional Landscape and Capacity

Environmental and social management involves multiple institutions at federal and state levels, with varying capacities:

- *Federal Ministries (MoECC, Labour, Public Works)*: Hold the primary regulatory mandates but often lack sufficient technical capacity and resources for robust enforcement.
- *State-Level Ministries*: Their effectiveness is often linked to their fiscal capacity, with stronger states like Puntland having more developed regulatory frameworks. Most states rely heavily on federal guidance and donor support.
- *Ministry of Finance (MoF)*: As the project proponent, the MoF is responsible for ensuring contractor compliance with the ESIA and safeguard requirements, though it currently lacks an in-house safeguards unit.

D. BASELINE ENVIRONMENTAL AND SOCIAL CONDITIONS

1.1. Physical Environment

Project Locations and Site Context

The four revenue office construction sites are situated on government-owned land within state capitals, each with distinct geographical characteristics. The Baidoa site lies in a mixed residential-commercial area adjacent to a roadside drainage channel at coordinates 3° 6.995′ N, 43° 38.768′ E. Jowhar's location rests within a secure government compound at 2° 46′ 17″ N, 45° 29′ 46″ E, while Kismayo occupies space inside the walled Ministry of Finance compound at 0°21′43″ S, 42°32′52″ E. Dhuusamareb positions itself in a government precinct on the town outskirts at 5° 31′ 55″ N, 46° 22′ 55″ E.

Land Use and Land Cover

Current land use patterns reveal distinct characteristics across all project sites. In Baidoa, the project area consists of compacted bare ground with minimal vegetation, situated within an active urban setting surrounded by residential and commercial structures. Dhuusamareb's site similarly features predominantly bare land with scattered trees, hosting key government installations including the Ministry of Humanitarian Affairs and Ministry of Information. Jowhar presents a unique landscape with short grasses and scattered vegetation, complemented by nearby banana plantations within the government compound. Kismayo's site contains drying grasses and scattered trees, sharing space with existing Ministry of Finance offices and paved parking areas, reflecting its established institutional use.

Climate and Meteorology

All sites experience Somalia's characteristic arid to semi-arid climate, though with important regional variations that affect construction planning. Baidoa and Dhuusamareb face semi-arid conditions with erratic rainfall patterns and high drought vulnerability. Jowhar receives higher rainfall but contends with significant flood risks from the Shabelle River system. Kismayo experiences a coastal humid climate with distinct tropical rainfall periods that influence construction scheduling and stormwater management requirements.

Air Quality

Air quality conditions remain generally favorable across all project locations. Monitoring data indicates pollutant concentrations predominantly fall within World Health Organization guidelines, though Jowhar occasionally approaches $PM_{2.5}$ thresholds during dry periods. Primary air quality concerns stem from road dust, vehicle emissions, and seasonal dust storms that characterize the region. Construction activities are expected to cause temporary, localized increases in particulate matter that will require diligent dust control measures.

Ambient Noise and Vibration

The acoustic environment varies significantly between sites, with urban centers experiencing moderate noise levels of 50-65 dB(A) while Dhuusamareb maintains quieter conditions at 40-50 dB(A). All current noise measurements remain within acceptable limits for their respective zones. Construction activities will generate substantial temporary noise increases between 75-100 dB(A), necessitating careful scheduling and noise mitigation strategies, particularly for the community-adjacent Baidoa site.

Drainage and Stormwater Management

Drainage infrastructure presents a mixed picture across the project sites. Baidoa benefits from an established roadside drainage system adjacent to the project area, though maintenance challenges

affect its efficiency. Jowhar lacks formal drainage infrastructure entirely, creating significant flood vulnerability in the Shabelle River basin. Kismayo operates with partial drainage coverage that proves inadequate during heavy rainfall, while Dhuusamareb relies completely on natural infiltration and requires comprehensive stormwater management planning.

Soil and Geological Conditions

Soil conditions demonstrate notable variation across the project sites. Baidoa's clay-rich Vertisols require careful engineering due to pronounced shrink-swell characteristics that affect foundation stability. Jowhar's fertile alluvial soils demand special consideration for their low bearing capacity when saturated, particularly given the flood-prone location. Kismayo's sandy coastal soils present erosion control challenges, while Dhuusamareb's sandy loams over bedrock offer relatively stable construction conditions with proper preparation.

1.2. Biological Environment

Flora and Vegetation Patterns

The biological environment across all project sites reflects substantial human modification typical of urban centers. Vegetation remains generally sparse, dominated by scattered grasses and drought-adapted shrubs that have naturally colonized the areas. Isolated trees provide minimal canopy cover, with Jowhar exhibiting relatively more developed greenery including small banana plantations within the compound. The floral composition indicates high adaptability to arid conditions and significant resilience to urban pressures.

Fauna and Wildlife Presence

Wildlife presence proves extremely limited, consisting primarily of common bird species that have adapted to urban environments. Comprehensive site assessments revealed no significant populations of terrestrial mammals or reptiles within the project boundaries. Importantly, none of the sites are located adjacent to sensitive ecological habitats such as protected areas, wetlands, or regions of high biodiversity value. The absence of significant flora and fauna reduces potential ecological impacts but necessitates maintained vigilance during construction to prevent unnecessary environmental disturbance.

1.3. Socio-Economic Context

Demographic Profile and Social Setting

The demographic profile of each project location reflects their status as an administrative capitals experiencing urban growth and migration pressures. Baidoa and Jowhar host significant internally displaced populations that increase social vulnerability, while all communities maintain strong clan-based social structures reinforced by religious institutions. Comprehensive surveys confirmed no cultural heritage sites exist within immediate project areas, though local mosques serve as important community centers near all locations.

Economic Activities and Livelihoods

Economic foundations across the project regions feature mixed livelihood strategies centered on traditional and modern sectors. Livestock production forms the primary economic activity in Baidoa and Dhuusamareb, while Jowhar's economy dominates in agricultural production through irrigated floodplain farming. Kismayo serves as a crucial regional trade hub leveraging its port facilities, and all towns show growth in service sector employment linked to government and NGO operations. The informal economy provides essential survival mechanisms through widespread petty trade and motorcycle transportation services.

Social Services and Infrastructure

Social infrastructure demonstrates consistent limitations across all project locations. Educational facilities remain inadequate with persistent gender disparities in access, while healthcare services rely heavily on humanitarian organization support. Utility services prove unreliable, particularly electricity supply and clean water access, and sanitation infrastructure requires substantial improvement. Housing conditions range from permanent structures in urban cores to expansive informal settlements, especially around Baidoa where displacement has created large vulnerable communities.

1.4. Key Sensitivities and Receptors

Primary Sensitive Receptors

Several sensitive receptors require careful consideration during project implementation. Government operations form primary concerns at the Jowhar, Kismayo, and Dhuusamareb sites, where construction activities may disrupt ministry functions and staff productivity. Local communities surrounding the Baidoa site represent the most vulnerable population due to direct residential proximity and potential impacts on daily life. Existing infrastructure, particularly Baidoa's drainage system, demands protection from construction-related sedimentation and damage.

Vulnerability and Risk Assessment

Workforce safety emerges as a consistent priority across all locations, encompassing both construction workers and regular commuters accessing government compounds. Public health considerations remain paramount, especially in communities with pre-existing vulnerabilities related to water, sanitation, and hygiene limitations. The risk exposure varies significantly between sites, with Baidoa presenting the highest community impact potential due to its integrated urban location and drainage adjacency. The contained compound settings at Jowhar, Kismayo, and Dhuusamareb naturally limit broader community impacts but concentrate effects on government operations. All sites share common concerns regarding construction emissions, traffic management, and occupational safety standards that require systematic mitigation approaches. This comprehensive baseline assessment establishes the necessary foundation for identifying project-specific impacts and developing targeted management measures in subsequent Environmental and Social Impact Assessment chapters.

Stakeholder Engagement

As part of the Environmental and Social Impact Assessment (ESIA) for the construction of Revenue Collection Offices under the Institutional Support for Economic Governance Project (ISEGP), a series of public consultations and stakeholder engagement workshops were conducted between 28th August and 7th September 2025. The consultations were held in Dhuusamareb, Kismayo, Jowhar, and Baidoa, bringing together representatives from state ministries, local authorities, civil society organizations, community-based organizations (CBOs), business associations, women’s and youth groups, vulnerable and marginalized groups (VMGs), and residents from surrounding communities.

Overall, stakeholders expressed strong support for the project, recognizing its potential to strengthen revenue collection, enhance governance, and contribute to sustainable development.

- *Dhuusamareb (Galmudug State):*

Stakeholders highlighted the importance of transparent land arrangements and effective environmental safeguards to address dust, drainage, and waste challenges. They also emphasized prioritization of local hiring and consistent community engagement. The Ministry of Finance committed to fair employment practices, robust environmental mitigation, and ongoing communication.

- *Kismayo (Jubbaland State):*

Participants welcomed the project as an opportunity to improve governance and economic service delivery. Key concerns included construction-related disruption, traffic safety, and equitable job opportunities for youth and women. Stakeholders also stressed the importance of a grievance redress mechanism (GRM). The project team pledged to adopt inclusive recruitment, integrate safety measures, and operationalize a functional GRM.

- *Jowhar (Hirshabelle State):*

Consultations in Jowhar focused on the need for climate-resilient infrastructure due to frequent flooding in the area. Communities raised concerns about solid waste management, stormwater drainage, and transparency in procurement and revenue use. The Ministry of Finance committed to adopting climate-smart designs, establishing effective waste systems, and strengthening accountability through regular public updates.

- *Baidoa (South West State):*

Stakeholders strongly supported the project, viewing it as essential for improving governance and stimulating local economies. Concerns centered on construction-related noise, dust, and community disruption, as well as ensuring equitable access to benefits. Women's groups emphasized inclusive hiring and accessibility for vulnerable groups. Commitments were made to apply dust and noise control, prioritize at least 60% local unskilled labor, and integrate inclusive design features.

E. ESIA IMPACTS ASSESSMENT AND MITIGATION STRATEGIES

1.1. Project Overview and Methodology

This assessment identified and evaluated the potential environmental and social impacts of constructing modern revenue collection offices in four locations. The analysis covered all project phases using a comprehensive methodology that integrated desktop review, field observations, and stakeholder consultations conducted between August and September 2025. Impacts were assessed against five criteria: magnitude, duration, reversibility, spatial scale, and likelihood, with risk ratings classified as Low, Moderate, High, or Very High.

1.2. Significant Positive Impacts

The project was found to generate substantial positive impacts across multiple dimensions. Economically, it created employment opportunities during construction and operation phases, with a target of 60% local labor recruitment. The stimulation of local economies through SME development and supply chain opportunities represented a high-significance benefit. Institutionally, the project enhanced government efficiency, fiscal transparency, and governance capacity through modernized facilities and digital systems. Environmentally, climate-resilient designs incorporating solar energy, water conservation, and sustainable building materials set new standards for public infrastructure.

1.3. Construction Phase Impacts

The construction phase presented the highest concentration of environmental and social risks. Key concerns included high-risk impacts from occupational safety hazards, community health and safety risks, and solid waste generation. Air pollution from dust and emissions, noise pollution affecting sensitive receptors, and water contamination risks were rated as moderate to high. Social risks included potential gender-based violence and harassment, child labor concerns, and population influx-related pressures. The Baidoa site demonstrated particular sensitivity due to its community-adjacent location, requiring enhanced mitigation measures.

1.1. Operational Phase Impacts

During operations, the project transitioned to delivering long-term benefits while managing sustainability considerations. Security risks associated with government facilities and cash handling were rated high, requiring robust security arrangements. Moderate risks included increased solid waste generation, wastewater management challenges, and traffic congestion around office locations. Utility demand pressures on local water and electricity resources necessitated efficient resource management. Social inclusion considerations required accessible design to ensure equitable service access for all community members.

1.2. Cumulative and Indirect Impacts

The simultaneous implementation across multiple locations created cumulative pressures on urban services, including waste management and road infrastructure. Secondary economic development around office locations presented both opportunities and challenges for urban planning. The enhanced state presence contributed to governance legitimacy, while inclusive implementation was crucial to prevent perceptions of marginalization among vulnerable groups.

1.3. Risk Classification and Management

The overall project risk was classified as Medium (Category 2), indicating that while significant risks existed, they were predictable, localized, and manageable through appropriate mitigation measures. The Environmental and Social Management Plan provided a comprehensive framework for addressing

these impacts through the mitigation hierarchy of avoidance, minimization, restoration, and compensation. Successful risk management required continuous monitoring, adaptive management, and stakeholder engagement throughout the project lifecycle.

1.4. Mitigation Measures

Error! Not a valid bookmark self-reference. below presents a summary of ESIA's potential negative impacts and mitigation measures.

Project Phase	Specific Environmental & Social Impacts	Significance / Risk Rating	Mitigation Measures
Pre-Construction	Demolition debris (Jowhar, Baidoa, Dhuusamareb) Loss of vegetation & trees Exclusion of women, youth & VMGs in consultations Stakeholder grievances due to inadequate information	High – Moderate	Develop and implement site-specific Waste Management Plans - Compensatory tree planting (2:1 ratio) - Ensure inclusive stakeholder engagement (women, youth, VMGs, PWDs) - Establish a functional Grievance Redress Mechanism (GRM) before commencement of works
Construction	- Air quality degradation (dust, vehicular emissions) - Noise & vibration affecting nearby communities - Soil erosion & contamination from fuel/lubricants - Water resource pollution from runoff & improper waste disposal- Solid & liquid waste accumulation - Occupational health & safety hazards (falls, equipment accidents) - Labour influx → risk of GBV/SEA/SH, child labour, communicable diseases (HIV, TB) - Traffic congestion & accidents- Increased demand for water &	High	- Dust suppression (regular sprinkling, covering stockpiles, paved access routes) - Noise barriers & restrict noisy works to daytime- Fuel storage in bunded areas & spill kits - Drainage & sediment traps to prevent water contamination - Licensed disposal & recycling of solid waste- Mandatory PPE & OHS training - Enforce Worker Code of Conduct, GBV/SEA awareness & reporting channels- Strict ban on child labour- Traffic & safety management plan with signage & marshals- Prioritize local hiring (≥60% unskilled labour)- Install energy-efficient machinery & promote climate-friendly technologies

Project Phase	Specific Environmental & Social Impacts	Significance / Risk Rating	Mitigation Measures
	power- Security risks at construction sites		
Operation	- Increased energy consumption & air emissions (GHG) - Solid waste generation (paper, e-waste, office waste)- Liquid waste from sanitation facilities - Increased water demand & wastewater discharge - Traffic congestion around new facilities- Accessibility barriers for PWDs - OHS risks for office staff (ergonomic hazards, fire risks) - Community health & safety issues (visitor influx, sanitation pressure) - Security risks (targeting of government hubs)	High – Moderate	- Integrate renewable energy (solar PV, efficient HVAC systems) -Waste management hierarchy (reduce–reuse–recycle) - Establish waste segregation stations & partner with recyclers -Onsite or municipal wastewater treatment- Rainwater harvesting & greywater reuse - Parking & traffic flow design with local traffic police - Ensure universal accessibility (ramps, signage, assistive facilities) - Conduct OHS & fire safety drills - Community awareness on public health & sanitation- Deploy security protocols (CCTV, guards, screening)
Decommissioning	- Demolition waste & debris- Dust & noise -Soil & groundwater contamination from improper disposal- OHS hazards (falls, equipment risks) -Land instability & safety	High – Moderate	- Controlled demolition with dust suppression & noise control - Debris recycling, reuse of materials & safe disposal at licensed sites - Soil & groundwater remediation before handover- Secure site fencing during demolition - Rehabilitation & landscaping of land post-use

Project Phase	Specific Environmental & Social Impacts	Significance / Risk Rating	Mitigation Measures
	hazards- Loss of employment for project staff -Risk of child labour in scavenging/waste collection -Community exposure to hazards		- Worker transition support (re-deployment, training) - Prohibit child labour in waste management - Adopt low-emission equipment for demolition
Residual Impacts	- Long-term GHG emissions from energy use - Persistent office noise- Generation of non-recyclable waste - Increased water demand - Ongoing OHS risks (staff stress, minor accidents) - Continued traffic congestion - Low-level public health & security risks	Moderate – High	-Carbon offsetting (tree planting, renewable integration) -Install noise-dampening materials & green buffers - Adopt zero-waste office policy & e-waste recycling - Water conservation measures & greywater reuse - Ergonomic furniture & staff wellness programs - Ongoing traffic management collaboration with municipalities - Strengthen public security measures (joint patrols, surveillance)

Table 0- 1: Summary of ESIA's Potential Negative Impacts and Mitigation Measures

F. ANALYSIS OF ALTERNATIVES

The analysis of alternatives evaluated multiple options for the revenue office projects against criteria of functionality, sustainability, and risk. The "No Project" alternative was rejected as it would perpetuate inefficient services and miss key development opportunities.

For site selection, government-owned parcels within existing ministry compounds were chosen in all locations. This approach avoided land acquisition issues, provided security, and enabled institutional synergy while maintaining public accessibility.

The preferred design features two-storey buildings, optimizing space in constrained compounds. Construction will use conventional concrete techniques, suitable for local capacity, with full site clearance for efficiency and safety.

Operational plans prioritize preventive maintenance for long-term sustainability. Environmental measures include integrated waste management with recycling components and hybrid solar-grid energy systems to ensure reliability while reducing emissions and costs.

G. ENVIRONMENTAL AND SOCIAL MANAGEMENT AND MONITORING PLAN (ESMMP)

1.1. Risk Management Measures

Environmental and Social Risks and Corresponding Mitigation Measures:

a. *Air Pollution (Dust and Emissions):*

- Regular water spraying, covering of debris, use of low-emission machinery.
- Monitoring of ambient air quality during demolition and construction.

b. *Noise and Vibrations:*

- Restrict noisy activities to daylight hours, use noise barriers, and perform routine equipment maintenance.

c. *Soil and Water Contamination:*

- Install spill containment basins; avoid fuel/oil storage near drains; conduct soil and water testing.

d. *Waste Generation (Solid, Liquid, and Hazardous):*

- Segregate and store solid waste, engage licensed haulers and implement asbestos-safe removal *practices if any.*

e. *Occupational Health and Safety (OHS):*

- Daily safety briefings, provision of PPE and enforcement of safety signage and emergency protocols.

f. *Community Health and Safety:*

- Secure the site perimeter, provide traffic control measures and conduct community awareness sessions.

g. *Biodiversity and Vegetation Loss:*

- Implement replanting and landscaping with native species after major earthworks.

h. *Social Risks (GBV, HIV/STI, labour Influx):*

- Enforce Code of Conduct, provide HIV awareness training and establish GBV reporting hotlines.

i. *Security and Intrusion Risks:*

- 24/7 site security, fencing, access control and collaboration with law enforcement agencies.

1.2. Environmental and Occupational Health & Safety (EOHS) Clauses in Works Contracts:

Contracts for all contractors will include enforceable clauses covering:

(i) General rules for hygiene, health, and safety on construction sites.

(ii) Mandatory HIV/AIDS and STI awareness training and provision of condoms.

(iii) Community-worker interaction protocols emphasizing the protection of minors and vulnerable persons.

(iv) Gender equity, GBV prevention, and response to sexual exploitation and abuse (SEA).

(v) Chance finds a procedure for managing culturally or archaeologically significant discoveries.

1.3. Capacity Building Measures:

MoF-funded training on Environmental and Social Safeguards (ISS), GBV prevention, emergency response and grievance redress mechanisms for contractors, site supervisors, and community leaders.

1.4. Key ESMP Implementation Indicators

- Percentage of waste managed through licensed handlers (target: 100%)
- Number of H&S trainings conducted and workers trained (target: ≥ 4 sessions per phase
- Number of GBV awareness sessions conducted (target: ≥ 2 per phase)
- Air, water, and noise monitoring compliance (target: 100% as per schedule)
- Number of community grievances addressed through GRM (target: all within 14 days)

1.5. Institutional Roles and Responsibilities for ESMP Implementation

The effective implementation of the Environmental and Social Management and Monitoring Plan (ESMMP) will be anchored within a well-defined institutional framework led by the Project Implementation Entity (PIE) through a Project Implementation Unit (PIU) established under the Ministry of Finance. The PIU serves as the central coordination body, tasked with the day-to-day management, compliance monitoring, stakeholder engagement, and reporting of all environmental and social safeguards.

The PIU will work in collaboration with permanent institutions, including:

- The Directorate of Environment and Climate Change (DECC), ensures regulatory compliance and environmental oversight.
- The African Development Bank (AfDB), provides technical supervision aligned with its safeguards policies.
- The Ministry of Finance (MoF), leads project development and ensures adherence to ESMP commitments.

In addition, a temporary multi-stakeholder Grievance Redress Committee will be constituted to manage complaints and conflicts arising during implementation

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1.1. Environmental and Social Management and Monitoring Plan Matrix

Code	Project Phase	Activity / Impact	Mitigation / Enhancement Measures	Deadline / Timing	Monitoring Frequency	Key Performance Indicators (KPIs)	Implementation Responsibility	Monitoring / Oversight	Source of Funds
IMP-01	Pre-Construction	Land take & resettlement	Ensure transparent land access agreements, minimize land footprint, and prioritize use of public land where feasible	Before construction	Once (pre-construction)	Signed land access agreements, clearance approvals	PIU, MoF, State Ministries	PIU Safeguards Unit	Project Budget
IMP-02	Pre-Construction	Soil, water, vegetation disturbance during surveys	Conduct baseline surveys with minimal soil disturbance, avoid sensitive areas	Pre-construction	Once (pre-construction)	Baseline reports completed	PIU, Env. Consultants	MoE, PIU	Project Budget
IMP-03	Pre-Construction	Community unpreparedness, conflict	Disclosure meetings, awareness sessions, hotline for grievances	Pre-construction	Bi-weekly during engagement	Consultation minutes, GRM records	PIU, Local Authorities	PIU, GRM Committee	Project Budget
IMP-04	Pre-Construction	Vulnerable groups exclusion	Inclusive consultations (women, PWDs, youth, VMGs)	Pre-construction	Each engagement	% of vulnerable groups consulted	PIU, NGOs, Local Chiefs	PIU Social Officer	Project Budget
IMP-05	Construction	Vegetation loss (site clearing)	Native species replanting, landscaping plan	After civil works	Weekly	Vegetation index, site photos	Contractor, MoE	PIU Env. Specialist	Contractor Budget
IMP-06	Construction	Air pollution (dust,	Dust suppression,	Daily	Daily	Dust logs, AQI reports	Contractor	PIU, Env. Dept	Contractor Budget

Code	Project Phase	Activity / Impact	Mitigation / Enhancement Measures	Deadline / Timing	Monitoring Frequency	Key Performance Indicators (KPIs)	Implementation Responsibility	Monitoring / Oversight	Source of Funds
		emissions)	cover trucks, AQI monitoring, PPE for workers						
IMP-07	Construction	Noise & vibration	Restrict noisy work to day, install barriers, equipment maintenance	Throughout construction	Daily	Noise/vibration logs, complaints resolved	Contractor	PIU, Local Env. Dept.	Contractor Budget
IMP-08	Construction	Water pollution (runoff, spills)	Install containment basins, silt traps, no hazardous storage near drains	Continuous	Weekly	Water quality tests, drainage checks	Contractor	PIU, Sanitation Dept.	Contractor Budget
IMP-09	Construction	Soil compaction & erosion	Use defined routes, loosen compacted areas, erosion control	Weekly	Weekly	Site inspection reports	Contractor	ESMP Consultant	Contractor Budget
IMP-10	Construction	Pressure on utilities (water, electricity)	Stagger deliveries, liaise with utility providers, conservation measures	Weekly	Weekly	Utility outage/complaint logs	Contractor, Municipality	PIU, Utility Agencies	Project Budget
IMP-11	Construction	Solid & liquid waste	Segregate waste, recycle, use licensed disposal sites	Daily	Daily	Waste logs, inspections	Contractor	PIU, Sanitation Dept.	Contractor Budget
IMP-12	Construction	Hazardous waste exposure	Licensed handlers, PPE, training,	As needed	Monthly	Hazardous waste manifests,	Contractor	MoF Safeguard	Project Budget

Code	Project Phase	Activity / Impact	Mitigation / Enhancement Measures	Deadline / Timing	Monitoring Frequency	Key Performance Indicators (KPIs)	Implementation Responsibility	Monitoring / Oversight	Source of Funds
			manifests			incident reports		s, PIU	
IMP-13	Construction	Occupational health & safety	Daily toolbox talks, PPE, signage, trained H&S officer	Daily	Daily	Safety audits, incident reports	Contractor, H&S Officer	PIU H&S Expert	Contractor Budget
IMP-14	Construction	Child labour risk	Age verification, enforce labour policy	Pre-construction & ongoing	Weekly	Site audit reports, staff records	Contractor	PIU, Labour Office	Contractor Budget
IMP-15	Construction	GBV / SEA/SH	GBV Action Plan, worker sensitization, hotline, code of conduct	Pre-construction & ongoing	Monthly	GBV case logs, training attendance	Contractor, PIU	GBV Focal Point, Safeguards	Project Budget
IMP-16	Construction	HIV/STI risk	Awareness campaigns, condom distribution, health services	Monthly outreach	Monthly	Outreach reports, STI clinic referrals	PIU, MoH Partner	Local Health Dept.	Project Budget
IMP-17	Construction	Population influx & conflict	Prioritize local hiring, CoC enforcement, grievance redress	Pre-deployment & ongoing	Monthly	Grievance logs, % local hires	Contractor, PIU	Local Admin	Project Budget
IMP-18	Construction	Community disturbance (traffic, noise, safety)	Notice boards, detour signs, community liaison officer	Daily	Weekly	Resolved complaints	Contractor, Local Authority	PIU	Project Budget
IMP-19	Construction	Climate change (GHG emissions)	Energy-efficient machinery, track fuel use, offsets	Continuous	Monthly	Fuel logs, GHG estimates	Contractor	ESMP Consultant, PIU	Project Budget

Code	Project Phase	Activity / Impact	Mitigation / Enhancement Measures	Deadline / Timing	Monitoring Frequency	Key Performance Indicators (KPIs)	Implementation Responsibility	Monitoring / Oversight	Source of Funds
			(tree planting)						
IMP-20	Construction	Security risks (crime, theft, terrorism)	Fencing, guards, lighting, 24/7 surveillance	Continuous	Weekly	Security logs, breach reports	Contractor, MoF Security	PIU, Security Dept.	Project Budget
IMP-21	Construction	Awareness & emergency preparedness	Sensitization sessions, IEC materials, hotline	Start-up + ongoing	Monthly	Session reports	PIU, CDO	GRM Committee	Project Budget
IMP-22	Construction	Safeguards & GBV capacity building	AfDB ISS & GBV training for contractors, supervisors	Pre-mobilization	Once (pre-works)	Training records, test scores	PIU	MoF Capacity Fund	Project Budget
IMP-23	Operation	Air emissions (GHG, HVAC, gensets)	Renewable energy integration, energy-efficient systems	Continuous	Quarterly	Energy audit reports	PIU, Facility Manager	PIU, Env. Dept.	O&M Budget
IMP-24	Operation	Office waste (solid, e-waste)	Waste segregation, recycling, zero-waste policy	Weekly	Monthly	Waste audit reports	Facility Manager	PIU, Municipality	O&M Budget
IMP-25	Operation	Liquid waste (sewage, greywater)	Proper treatment, oil-water separators, monitoring	Continuous	Monthly	Effluent test results	Facility Manager	PIU, Sanitation Dept.	O&M Budget
IMP-26	Operation	Water demand pressure	Install water-saving devices, rainwater harvesting	Continuous	Quarterly	Water audit reports	Facility Manager	PIU	O&M Budget
IMP-	Operation	Traffic congestion &	Traffic management	Continuous	Monthly	Traffic log,	Facility	Local Traffic	O&M

Code	Project Phase	Activity / Impact	Mitigation / Enhancement Measures	Deadline / Timing	Monitoring Frequency	Key Performance Indicators (KPIs)	Implementation Responsibility	Monitoring / Oversight	Source of Funds
27		safety	plan, signage, staff shuttles			accident reports	Manager	Police, PIU	Budget
IMP-28	Operation	OHS hazards (office staff)	Ergonomic workstations, fire drills, PPE	Continuous	Quarterly	Audit reports, incident logs	Facility Manager	PIU, OHS Officer	O&M Budget
IMP-29	Operation	Security risks (vandalism, terrorism)	Surveillance systems, police coordination, access control	Continuous	Monthly	Security logbooks	MoF Security	PIU Security Dept.	O&M Budget
IMP-30	Decommissioning	Demolition waste & debris	Controlled demolition, recycling, licensed disposal	End of project	Weekly	Waste logs, site inspections	Contractor	PIU, MoE	Contractor Budget
IMP-31	Decommissioning	Dust, noise & vibration	Controlled demolition, suppression, daytime work	During demolition	Daily	Noise logs, dust logs	Contractor	PIU	Contractor Budget
IMP-32	Decommissioning	Soil & groundwater contamination	Proper storage, remediation of contaminated sites	During demolition	Weekly	Soil/water test results	Contractor	Env. Specialist, PIU	Contractor Budget
IMP-33	Decommissioning	OHS hazards	Safety induction, PPE, emergency plan	Daily	Daily	H&S audit logs	Contractor	PIU H&S Expert	Contractor Budget
IMP-34	Decommissioning	Child labour risk (waste scavenging)	Strict subcontractor control, collaborate with local authorities	Ongoing	Monthly	Labour audit reports	Contractor	Labour Office, PIU	Contractor Budget

Code	Project Phase	Activity / Impact	Mitigation / Enhancement Measures	Deadline / Timing	Monitoring Frequency	Key Performance Indicators (KPIs)	Implementation Responsibility	Monitoring / Oversight	Source of Funds
IMP-35	Decommissioning	Social impacts (job loss)	Transition support, link workers to new jobs	End of project	Once	Training certificates, redeployment records	PIU, MoF	Labour Dept.	Project Budget
IMP-36	Residual	Long-term GHG emissions	Carbon offsets (tree planting, renewables)	Post-commissioning	Annual	Carbon audit, offset records	PIU, Facility Manager	Env. Dept.	O&M Budget
IMP-37	Residual	Traffic & accessibility	Improve walkways, collaborate with municipalities	Post-commissioning	Annual	Road safety reports	PIU, Local Govt	O&M Budget	
IMP-38	Residual	Community health & safety	Workplace wellness, linkages with health facilities	Continuous	Quarterly	Clinic reports, outreach records	Facility Manager, PIU	MoH	O&M Budget

Table 0- 2: ESMP Matrix

H. GRIEVANCE REDRESS MECHANISM (GRM)

An independent, accessible, and community-responsive Grievance Redress Mechanism (GRM) will be established for the construction of the proposed revenue collection offices across Baidoa, Kismayo, Jowhar, Dhuusamareb, and Bossaso. The GRM is designed to provide all project-affected persons (PAPs), including workers, nearby residents, and businesses, with a fair, transparent, and timely platform to raise concerns, complaints, or suggestions related to the project.

The GRM will operate at the state level through dedicated Grievance Redress Committees (GRCs) for each office site. Each GRC will be composed of representatives from the Project Implementation Unit (PIU), the State Ministry of Finance, local authorities, community leaders (elders, women, and youth), and the construction contractor. This ensures local ownership, inclusivity, and responsiveness to the concerns of diverse stakeholder groups.

The mechanism will be accessible through multiple channels, including in-person reporting at site offices, telephone hotlines, SMS, WhatsApp, email submissions, and drop boxes strategically placed at secure community locations. Complainants will also be able to file grievances anonymously without fear of retaliation.

All complaints will be logged in a centralized Grievance Register, acknowledged within three (3) working days, and addressed within fifteen (15) working days. If a grievance remains unresolved at the site-level GRC, it will be escalated to the Federal Ministry of Finance for review. As a last resort, complainants retain the right to pursue redress through Somalia's formal judicial system.

To ensure accessibility and cultural relevance, the GRM will integrate traditional dispute resolution practices where appropriate, supported by clear record-keeping and monitoring systems. A dedicated Public Information Officer at each site will facilitate communication between the project and the community, ensuring that resolutions are disseminated effectively and that complainants receive timely feedback.

Monthly GRM reports will be compiled and shared with the PIU and relevant stakeholders to monitor trends, track resolution timelines, and inform improvements to the project's environmental and social risk management. This process reinforces the project's principles of transparency, accountability, inclusivity, and trust-building with the host communities.

I. CONCLUSION AND RECOMMENDATION

Conclusion

The Environmental and Social Impact Assessment (ESIA) for the proposed revenue collection offices in Baidoa, Garowe, Hargeisa, and Kismayo demonstrates that the projects are environmentally, socially, and economically feasible. The new facilities are expected to enhance state-level revenue mobilization, strengthen service delivery, and support institutional growth.

Although the assessments identified potential risks such as waste generation, noise and dust emissions, traffic congestion, occupational health and safety concerns, and pressure on urban services, these impacts are moderate, localized, and can be effectively managed through established safeguards. With the proposed mitigation measures, the four revenue office projects are deemed viable for implementation without causing significant or irreversible harm to the environment or surrounding communities.

Recommendation

It is recommended that the four revenue collection office projects proceed to implementation, provided that the Environmental and Social Management Plans (ESMPs) are fully applied. This includes enforcing environmental and social safeguards, ensuring occupational health and safety standards, maintaining strong stakeholder engagement and grievance redress mechanisms, and adopting post-construction restoration measures. With strict compliance to national regulations and AfDB safeguards, the projects can be implemented sustainably while minimizing risks to communities and the environment.

1. GENERAL PROJECT INFORMATION

1.1. INTRODUCTION

Somalia is undergoing a critical phase in its journey of state building, economic recovery and institutional reform. After decades of conflict and fragility, the Federal Government of Somalia (FGS), together with the Federal Member States (FMSs), has embarked on an ambitious agenda to strengthen governance structures, improve public financial management and establish mechanisms that can sustain service delivery for its citizens. At the centre of this transformation is the recognition that domestic resource mobilisation is indispensable for reducing aid dependency, financing development priorities and creating a more resilient economy. Strengthening the ability of government institutions to collect, manage and account for revenues is, therefore, not only a fiscal necessity but also a governance imperative that enhances legitimacy and accountability.

To advance these efforts, the Government of the Federal Republic of Somalia has received funding from the African Development Bank (AfDB) under the Institutional Support for Economic Governance Project (ISEGP) to reinforce the foundations of sustainable economic governance. This support includes financing, technical assistance, training and infrastructure aimed at enhancing institutional capacity and improving fiscal management systems. A key intervention under the Enhancing Domestic Resource Mobilisation component is the construction of modern revenue collection offices in Dhuusamareb (Galmudug), Jowhar (Hirshabelle), Kismayo (Jubbaland), Bossaso (Puntland) and Baidoa (Southwest State), providing secure and well equipped facilities that enable tax and revenue authorities to operate more efficiently and effectively.

The construction of these revenue collection centres is of significant strategic value. First, it represents a tangible step toward decentralising fiscal authority and strengthening the presence of government institutions across the federal system. Second, the provision of physical infrastructure addresses a long-standing constraint faced by revenue authorities in Somalia, many of whom have been operating in inadequate or temporary spaces and rented spaces. Third, the facilities are expected to enhance transparency and accountability by improving record-keeping, security of documents and efficiency of taxpayer services. Beyond fiscal benefits, the project is expected to generate important socio-economic spillovers, such as short-term employment during construction, increased demand for local materials and services and improved accessibility of government services to communities.

At the same time, infrastructure projects inevitably carry potential risks that must be carefully managed to avoid undermining the intended benefits. Construction activities, however modest in scale, may have environmental impacts such as dust emissions, noise, the generation of construction waste and disruption of soils. Socially, they may require the acquisition of land or the repurposing of areas already in use, raising issues of displacement, access restrictions and community acceptance. The presence of contractors and construction workers can also give rise to occupational health and safety risks, traffic disruptions and, in some contexts, risks of gender-based violence or tensions with local communities if not properly mitigated. Recognising these possibilities, it becomes imperative to conduct Environmental and Social Impact Assessments (ESIAs) and prepare Environmental and Social Management Plans (ESMPs) for each of the five sites before construction begins.

The ESIA process is both a legal and developmental requirement. Nationally, Somalia's environmental legislation obliges developers of public infrastructure projects to undertake environmental assessments to ensure that potential impacts are identified and addressed prior to implementation. Regionally and internationally, development partners such as the African Development Bank have established safeguard policies that require borrowers to integrate environmental and social considerations into project planning and execution. The AfDB's Integrated Safeguards System sets out clear operational safeguards, including environmental and social assessment, involuntary resettlement, biodiversity conservation, pollution prevention, labor conditions, and stakeholder

engagement. Compliance with these safeguards is essential to ensure that the ISEGP not only delivers its intended benefits but does so in an environmentally sustainable manner, socially inclusive manner and consistent with best practices.

In addition to regulatory compliance, the ESIA process provides a structured opportunity for stakeholder engagement. Revenue collection touches directly on issues of governance and service delivery, which means that citizens' perceptions and acceptance of the project are critical for its success. By engaging with communities, local authorities, civil society organisations and other stakeholders, the ESIA helps to build trust, manage expectations and incorporate local knowledge into project design. Such engagement can also identify potential risks early on, including the presence of informal land users, cultural sensitivities, or specific community priorities, enabling the project to adopt proactive and context-sensitive mitigation measures. In this way, the ESIA not only safeguards the environment and communities but also strengthens the legitimacy and sustainability of the project itself.

The timing of this intervention is particularly significant given Somalia's broader national development agenda. The recently adopted National Transformation Plan (NTP) (2025–2029) emphasizes the dual priorities of institutional capacity building and sustainable economic growth. It highlights domestic resource mobilization as a cornerstone of fiscal self-reliance and improved governance. The ISEGP is fully aligned with this vision, providing both the "hardware" of physical infrastructure and the "software" of institutional support necessary to operationalize reform. By constructing revenue collection centers across the five federal member states, the project contributes directly to the goals of the NTP, while also aligning with the global Sustainable Development Goals, particularly SDG 16 on strong institutions, SDG 17 on partnerships for implementation, and SDG 8 on decent work and economic growth.

From an environmental and social perspective, the project represents an opportunity to demonstrate that state-building and infrastructure development can be carried out in a sustainable and inclusive manner. The relatively modest scale of the construction works, compared to large industrial or extractive projects, provides a manageable context in which to apply international best practice in environmental and social safeguards. This creates the potential to set precedents for future infrastructure projects in Somalia, strengthening national capacity for environmental governance and building confidence among development partners and citizens alike. The preparation and implementation of Environmental and Social Management Plans will further ensure that mitigation measures are not only identified but also operationalized, monitored and adjusted as necessary throughout the project life cycle.

The introduction of this ESIA report, therefore, serves to situate the ISEGP revenue collection centers within Somalia's broader developmental and institutional context, explain the rationale for environmental and social assessment and outline the expected benefits of the process. It underscores the fact that sustainable development requires balancing economic and governance objectives with environmental stewardship and social responsibility. By proactively identifying and addressing potential risks, the ESIA will enable the Ministry of Finance and the African Development Bank to implement the project in a way that maximizes benefits, minimizes harm and strengthens public confidence in government institutions.

1.2. Project goal

The overall goal of the Institutional Support for Economic Governance Project (ISEGP) is to strengthen Somalia's institutional capacity for effective domestic resource mobilization and public financial management through the construction of modern revenue collection offices across the five Federal Member States. By providing secure, functional, and well-equipped facilities, the project aims to enhance government service delivery, improve fiscal accountability, and contribute to sustainable economic recovery and state-building.

1.3. Objective of the ESIA

The main objective of the Environmental and Social Impact Assessment (ESIA) is to identify, predict, and evaluate the potential environmental and social impacts associated with the construction and operation of the revenue collection centers, and to develop Environmental and Social Management Plans (ESMPs) that ensure the project is implemented in a sustainable, inclusive, and compliant manner in line with Somali laws and the African Development Bank's safeguard policies.

1.3.1. Specific objectives

The specific objectives of the ESIA are to:

- Establish baseline conditions of the physical, biological, and socio-economic environment at each of the five proposed project sites.
- Identify and assess potential environmental and social impacts (both positive and negative) that may arise during the construction, operation, and decommissioning phases of the revenue collection centres.
- Propose appropriate mitigation and enhancement measures to avoid, minimize, or offset adverse impacts while maximizing project benefits.
- Develop site-specific Environmental and Social Management Plans (ESMPs) with clear roles, responsibilities, timelines, and budgets for implementation.
- Ensure compliance with relevant national laws, regulations, and policies, as well as the AfDB's Integrated Safeguards System (ISS) and international best practice.
- Promote stakeholder engagement and public participation by consulting affected communities, local authorities, and other stakeholders to incorporate their concerns and priorities into project planning and implementation.
- Recommend monitoring and reporting mechanisms to track the effectiveness of mitigation measures and ensure adaptive management throughout the project life cycle.
- Identify capacity-building and institutional strengthening needs to ensure sustainable implementation of environmental and social safeguards at both the federal and state levels.

1.4. Purpose of the ESIA

The proposed construction of the Revenue Collection Offices under the Ministry of Finance will involve developing new infrastructures, including demolishing a few small, non-essential structures in Johwar, Baidoa and Dhuusamareb to clear space for the new facility. While the demolition is limited in scope, the overall construction process will require heavy machinery, transportation of materials and other activities that may generate noise, dust, vibrations and increased traffic, particularly from construction vehicles. If not properly managed, these impacts could affect nearby communities and natural resources through localised pollution and disruption.

In this context, the Environmental and Social Impact Assessment (ESIA) is a critical tool to identify, analyse and evaluate the potential environmental and social effects of the project. Its objective is to

ensure that the construction is environmentally responsible, socially acceptable and fully compliant with the Environmental Management Act of 2024 and other applicable national regulations and policies.

Additionally, the African Development Bank (AfDB), as the financier, requires environmental assessments for all projects it supports to promote sustainability and informed decision-making.

1.5. Scope of the ESIA

The scope of this Environmental and Social Impact Assessment (ESIA) covers all activities associated with the planning, construction and operation of the proposed revenue collection offices across the four Federal Member States. The assessment focuses on identifying, predicting and managing the potential environmental and social risks that may arise throughout the project lifecycle, from site preparation and construction to operation and decommissioning (if applicable).

1.5.1. Specifically, the ESIA will:

- Examine how project activities may affect air quality, noise levels, water resources, soil stability, biodiversity and waste generation within and around each proposed site.
- Assess the impacts of site clearance, excavation, use of heavy machinery, construction materials sourcing and solid waste disposal on both the physical environment and nearby communities.
- Evaluate social implications such as disruption to the surrounding community or institutions, increased traffic and congestion, safety concerns for workers and the public, potential land acquisition or displacement and access restrictions during construction.
- Engage stakeholders, including local authorities, nearby institutions, business operators, local residents and other interested parties, to capture their views, concerns and recommendations.
- Propose practical mitigation and enhancement measures through a comprehensive Environmental and Social Management Plan (ESMP) tailored to each state's context.
- Ensure that the project complies with Somali environmental legislation, including the Environmental Management Act (2024), state-level environmental regulations, and the environmental and social safeguard policies of development partners such as the African Development Bank.

1.6. Approach and Methodology

The Social Impact Assessment (SIA) was prepared using a participatory, inclusive and evidence-based approach in line with Somali environmental legislation and international good practice (AfDB Integrated Safeguard). The methodology combined desk-based research with field-level data collection and stakeholder consultations to ensure a comprehensive understanding of the social context of the proposed revenue collection offices across the five Federal Member States.

1.6.1. Inception and Scoping

At the onset, the project documents, designs and site information were reviewed to understand the nature, scale and location of the proposed offices. Key social aspects likely to be influenced by the project were identified, including land use, livelihoods, access to services, community safety and vulnerable groups. A scoping exercise guided the focus of the subsequent assessment.

1.6.2. Literature and Document Review

The assessment began with an extensive review of available documents to understand the regulatory, policy, and institutional framework guiding the project. The review covered:

- National environmental legislation, including the Environmental Management Act (2020) and the National Environment Policy (2019).
- Safeguard frameworks from the African Development Bank and other development partners.
- Technical design documents, architectural drawings, and engineering proposals for the revenue offices.
- Relevant state-level planning guidelines, as well as past environmental and social studies, where accessible.
- State-level environmental regulations

1.6.3. Field Observations

Field missions were conducted across the Member States to capture the existing environmental and social context of the proposed sites. During these visits, the team examined:

- General site characteristics and the surrounding environment.
- Patterns of land use, adjacent infrastructure and sensitive facilities such as schools, health centers and markets.
- On-site features including buildings, access routes, drainage conditions and vegetation cover.

1.6.4. Stakeholder Engagement

Engagement with stakeholders was prioritized to ensure that diverse perspectives were considered in the assessment. This included:

- Key informant discussions with state officials, technical officers, and implementing partners.
- Focus group sessions with local community members, business operators and representatives of nearby institutions.
- Informal conversations with residents and users of the sites to capture everyday experiences and concerns.

1.6.5. Impact Analysis

Potential environmental and social impacts were identified using the information obtained from literature, field visits and stakeholder consultations. These impacts were:

- Categorized as beneficial or adverse, direct or indirect and temporary or permanent.
- Qualitatively assessed according to their probability of occurrence, intensity and overall significance.
- Traced to specific stages of the project, including site preparation, construction, operation, and potential closure.

1.6.6. Mitigation and Benefit Enhancement

Based on the identified issues, targeted measures were formulated to reduce negative effects and strengthen positive outcomes. These measures were tailored to local realities in each Member State and informed by the feedback of affected stakeholders.

1.6.7. Environmental and Social Management Plan (ESMP)

An ESMP was prepared to operationalise the recommendations of the ESIA. The plan sets out:

- Detailed mitigation and enhancement measures.
- Roles and responsibilities for implementation at state and institutional levels.

- Monitoring indicators and methods for tracking progress.
- Mechanisms for continued community engagement and grievance management.
- Reporting requirements and timelines for compliance.

1.6.8. Reporting and Validation

The findings of the SIA were compiled into this ESIA report and validated through internal review and consultation with key stakeholders to ensure accuracy and completeness.

1.7. Project Phases

The development of the revenue collection offices across the Federal Member States will proceed through distinct phases. Each phase has specific activities with potential environmental and social implications that have been considered in this ESIA.

1.7.1. Planning and Design Phase

- Site identification and acquisition, in coordination with state and local authorities.
- Preparation of architectural designs, structural drawings and engineering specifications.
- Environmental and social screening and scoping to determine potential risks and mitigation needs.
- Engagement with stakeholders to gather input on project design and location.

1.7.2. Site Preparation Phase

- Demolition of existing structures where applicable.
- Site clearance, grading and leveling.
- Establishment of temporary facilities such as site offices, storage yards and worker accommodation (if required).
- Installation of site security, fencing and signage.

1.7.3. Construction Phase

- Excavation and foundation works.
- Construction of superstructures, including office blocks and ancillary buildings.
- Installation of electrical, mechanical and plumbing systems.
- Development of supporting infrastructure such as drainage, parking, water supply and ICT cabling.
- Implementation of health, safety and environmental management measures to minimize risks to workers and communities.

1.7.4. Operation Phase

- Commissioning and handover of completed office facilities.
- Deployment of staff, installation of ICT systems and establishment of service counters.
- Day-to-day functioning of revenue collection and financial administration services.
- Ongoing maintenance of buildings, utilities, ICT systems and landscaping.
- Continuous implementation of environmental and social safeguards, including waste management, accessibility provisions and safety measures.

1.7.5. Decommissioning Phase (If Applicable)

- While not anticipated in the short to medium term, provisions exist for eventual decommissioning or relocation.
- Activities would include dismantling of buildings, removal of infrastructure, safe disposal of materials and site rehabilitation.
- Measures would be taken to minimize disruption and restore the environment to a stable condition.

1.8. Project Alternatives

In line with good environmental and social practice, different alternatives to the proposed project were considered to guide decision-making.

1.8.1. No Project Alternative

Under this option, no new revenue collection offices would be constructed. While this would avoid the environmental and social impacts associated with construction, it would also mean continued inefficiencies in revenue administration, limited accessibility for citizens, and missed opportunities for improved service delivery. This option was not considered viable.

1.8.2. Alternative Sites

During project planning, various potential sites within each Member State were reviewed in collaboration with state authorities. Criteria such as accessibility, land ownership, security, availability of utilities, and minimal displacement risks were applied in site selection. The chosen sites were determined to be the most practical and sustainable.

1.8.3. Alternative Designs

Different design options were evaluated to ensure cost-effectiveness, energy efficiency, and functionality. The selected design emphasizes standardized office layouts while allowing for minor adaptations to local conditions. Incorporation of accessibility features, natural lighting, and ICT infrastructure were prioritized.

1.8.4. Proposed Project (Preferred Alternative)

The construction and operation of dedicated revenue collection offices across the Member States was selected as the preferred alternative. This option balances functionality, accessibility, and sustainability while delivering significant social and institutional benefits.

1.9. Structure of the ESIA/ESMP Report

CHAPTER	DESCRIPTION
EXECUTIVE SUMMARY	Provides a concise overview of the Environmental and Social Impact Assessment (ESIA) report, highlighting the project's rationale, key findings, anticipated impacts, stakeholder inputs, and recommended mitigation and management measures.
1. GENERAL PROJECT INFORMATION	Outlines the background, objectives and justification of the project, as well as the purpose and scope of the ESIA.
2. PROJECT DESCRIPTION	Presents a detailed description of the proposed revenue collection offices, including project components, phases, design features, location and associated infrastructure.
3. POLICY, ADMINISTRATIVE AND LEGAL FRAMEWORK	Reviews relevant national, state and international legal instruments, policies, regulations and institutional arrangements that guide environmental and social management.
4. BASELINE ENVIRONMENTAL AND SOCIAL CONDITIONS	Describes the existing physical, biological and socio-economic environment of the project areas, providing a basis for assessing potential impacts.
5. STAKEHOLDER ENGAGEMENT	Summarises the engagement process with government agencies, local authorities, community members and other stakeholders, capturing concerns and inputs.
6. IMPACT IDENTIFICATION AND ASSESSMENT	Identifies potential positive and negative environmental and social impacts of the project, assesses their significance and links them to specific project phases.
7. ANALYSIS OF ALTERNATIVES	Explores alternative project options, including the “no project” alternative, alternative sites and design options, and presents the justification for the preferred choice.
8. MITIGATION Measures for Potential Impacts	Provides practical measures to avoid, minimize, or compensate for negative impacts and to enhance positive outcomes.
9. ENVIRONMENTAL AND SOCIAL MANAGEMENT AND MONITORING PLAN	Outlines the procedures and structures for receiving, addressing, and resolving complaints or concerns from stakeholders during project implementation.
10. CONCLUSION AND RECOMMENDATION	Details the framework for implementing mitigation measures, assigning responsibilities, monitoring indicators, timelines, and reporting requirements.
REFERENCES	Includes supporting information such as data collection tools, consultation records, maps,

	photographs, technical drawings, and references.

Table 2- 1: Structure of the ESIA/ESMP Report

2. PROJECT DESCRIPTION

2.1. Project Overview

The proposed project seeks to establish modern two-storey revenue collection offices in each of the Federal Member States to improve efficiency, transparency, and accessibility in public financial management. Currently, the revenue offices in Dhuusamareb, Baidoa, and Kismayo operate from rented premises that are small, overcrowded, and poorly suited to their functions. Similarly, the office in Jowhar is undersized and congested, limiting both staff productivity and the quality of public service delivery. These challenges have resulted in operational inefficiencies, constrained working conditions, and inadequate space for record management and client services. The project will address these gaps by constructing purpose-built, two-storey office complexes in each state, designed to provide adequate office space, secure data and record storage, modern utilities, and client service areas. The new facilities will create a safe and conducive working environment, enhance institutional capacity, and improve revenue collection systems for the benefit of government and citizens alike.

2.2. Project Location

The revenue collection offices projects will be implemented across four Federal Member State capitals: Dhuusamareb (Galmudug State), Baidoa (South West State), Kismayo (Jubbaland State), and Jowhar (Hirshabelle State). Each office will be constructed on centrally located plots within the respective urban centres to maximise accessibility for staff, clients and government partners. The selected locations are described below:

2.2.1. Dhuusamareb (Galmudug State)

The proposed project is located at latitude 5° 31′ 55″ N and longitude 46° 22′ 55″ E within the central administrative zone of Dhuusamareb, the capital of Galmudug State (*see* Image 3-1). The site lies on government-owned land within the same compound as the Ministry of Humanitarian and Disaster Management, the Ministry of Information, and Galmudug TV station. This concentration of institutions makes the area a recognized government precinct with moderate public activity and administrative functions. Its central positioning enhances accessibility and visibility, but also necessitates strict environmental, health, and safety measures during construction.

2.2.2. Baidoa (South West State)

The proposed project is located within Baidoa town, the administrative capital of South West State, at approximate coordinates of 3° 6.995′ N, 43° 38.768′ E (*see* Image 3-2). The site lies on government-owned land within a community setting. It is not currently occupied but is surrounded by residential houses, local businesses, and social amenities, whose residents will serve as the immediate receptors. The location provides high accessibility for the public but will require careful management of potential safety and social concerns during project implementation.

2.2.3. Kismayo (Jubbaland State)

The proposed project is located at latitude 0°21′43″ S and a longitude 42°32′52″ E, within Kismayo city, the capital of Jubbaland State (see Image 3-4). The site is situated within the compound of the Ministry of Finance, fully secured by a perimeter wall, and directly adjacent to the Ministry of Trade. The surrounding area includes other administrative facilities, making it part of an established government cluster. This secure setting offers strategic advantages for government operations but requires attention to traffic management, noise control, and safety considerations during construction.

2.2.4. Jowhar (Hirshabelle State)

The proposed project is located at latitude 2° 46′ 17″ N and longitude 45° 29′ 46″ E, within Jowhar town, the capital of Hirshabelle State *(see* Image 3-3*)*. The site is located inside a government compound that also houses the Ministry of Finance, Ministry of Planning, and Ministry of Commerce. The Ministry of Health is positioned directly adjacent to the compound gate, while the Hirshabelle State House is situated immediately behind the premises. This concentration of institutions reinforces the site's strategic role as an administrative hub, but also requires the project to adopt robust environmental and social management measures to minimize disruptions to ongoing government activities.

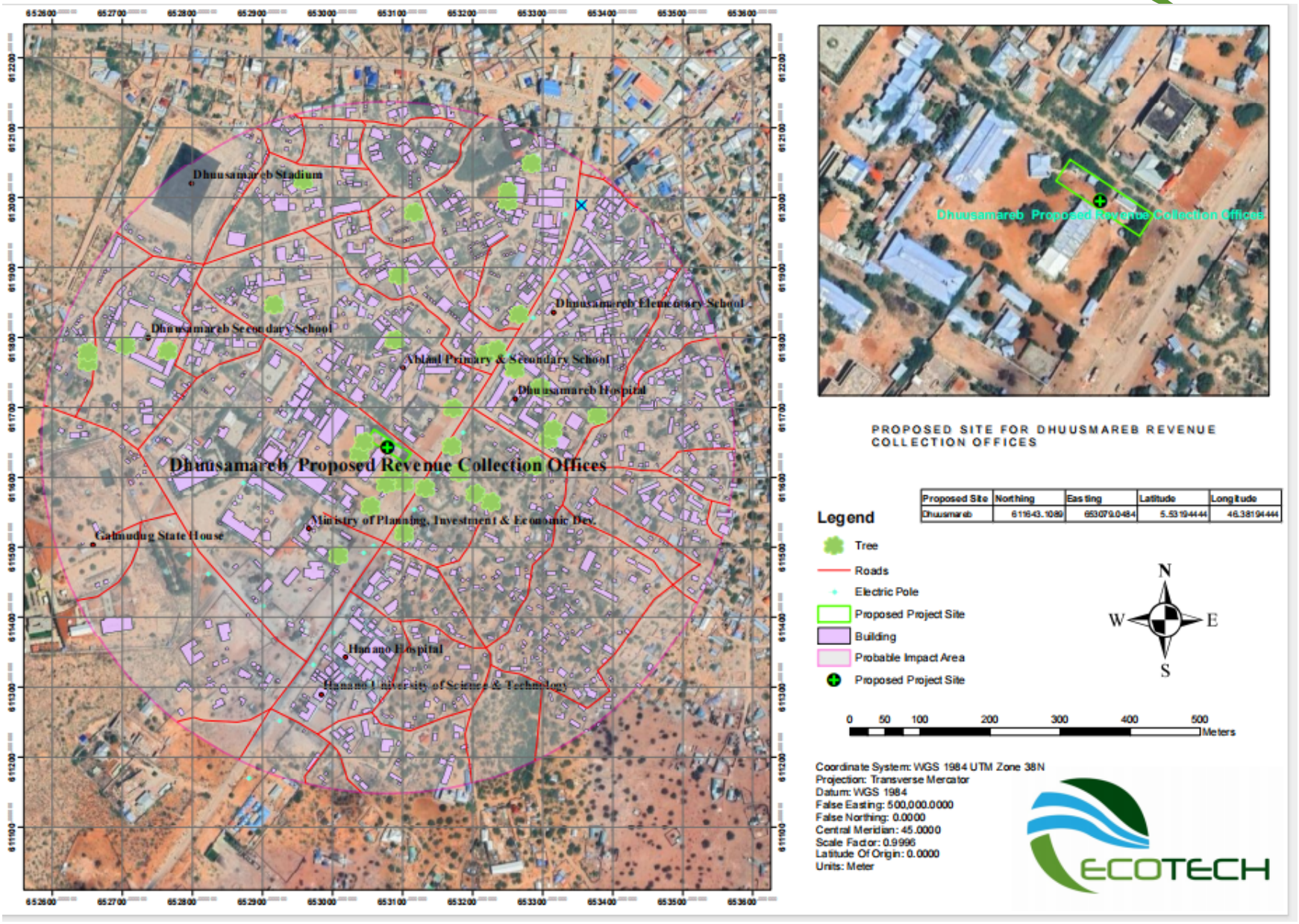

Image 3-1: Location Map of Dhuusamareb Site

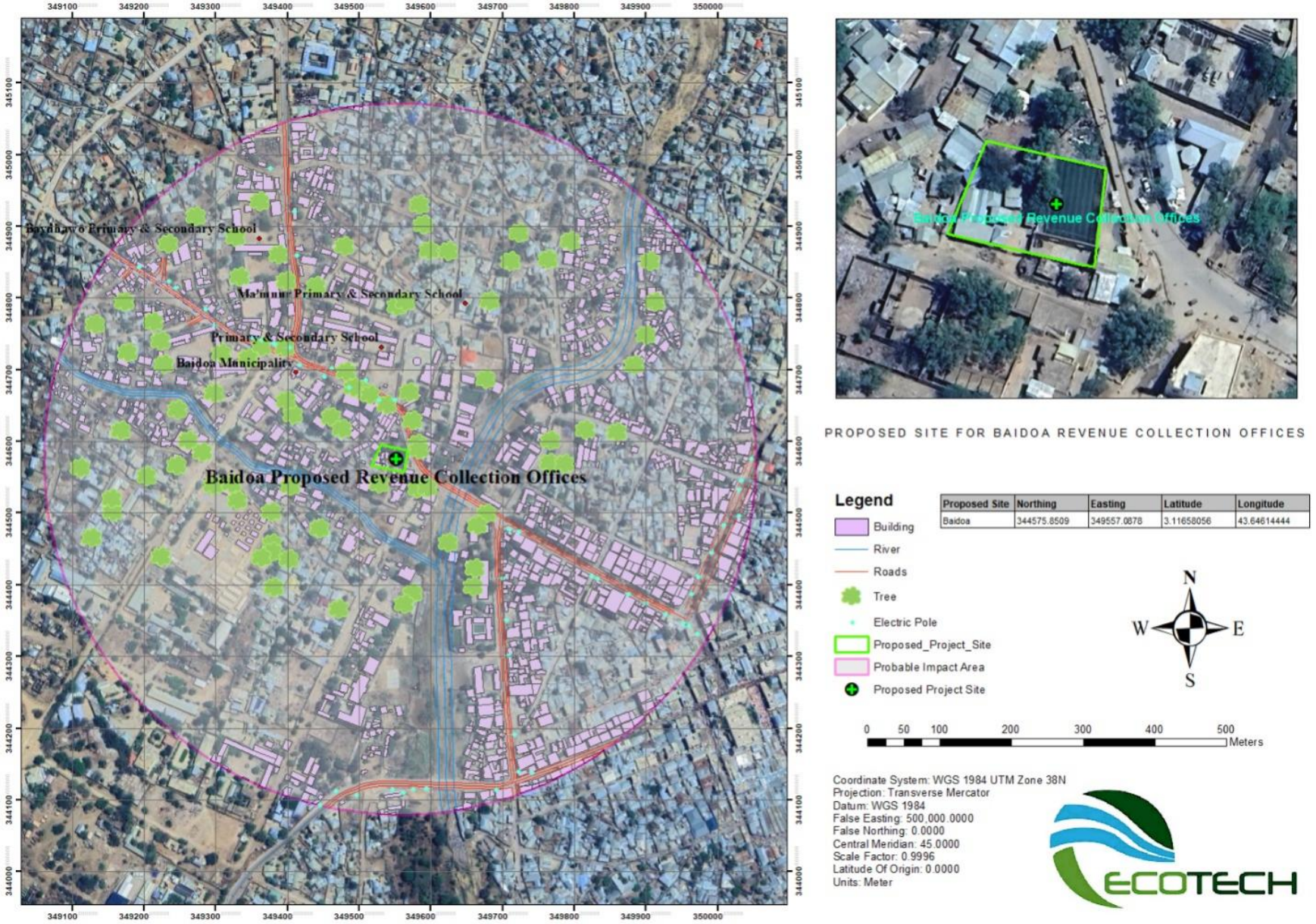

Image 3-2: Location Map of Baidoa Site

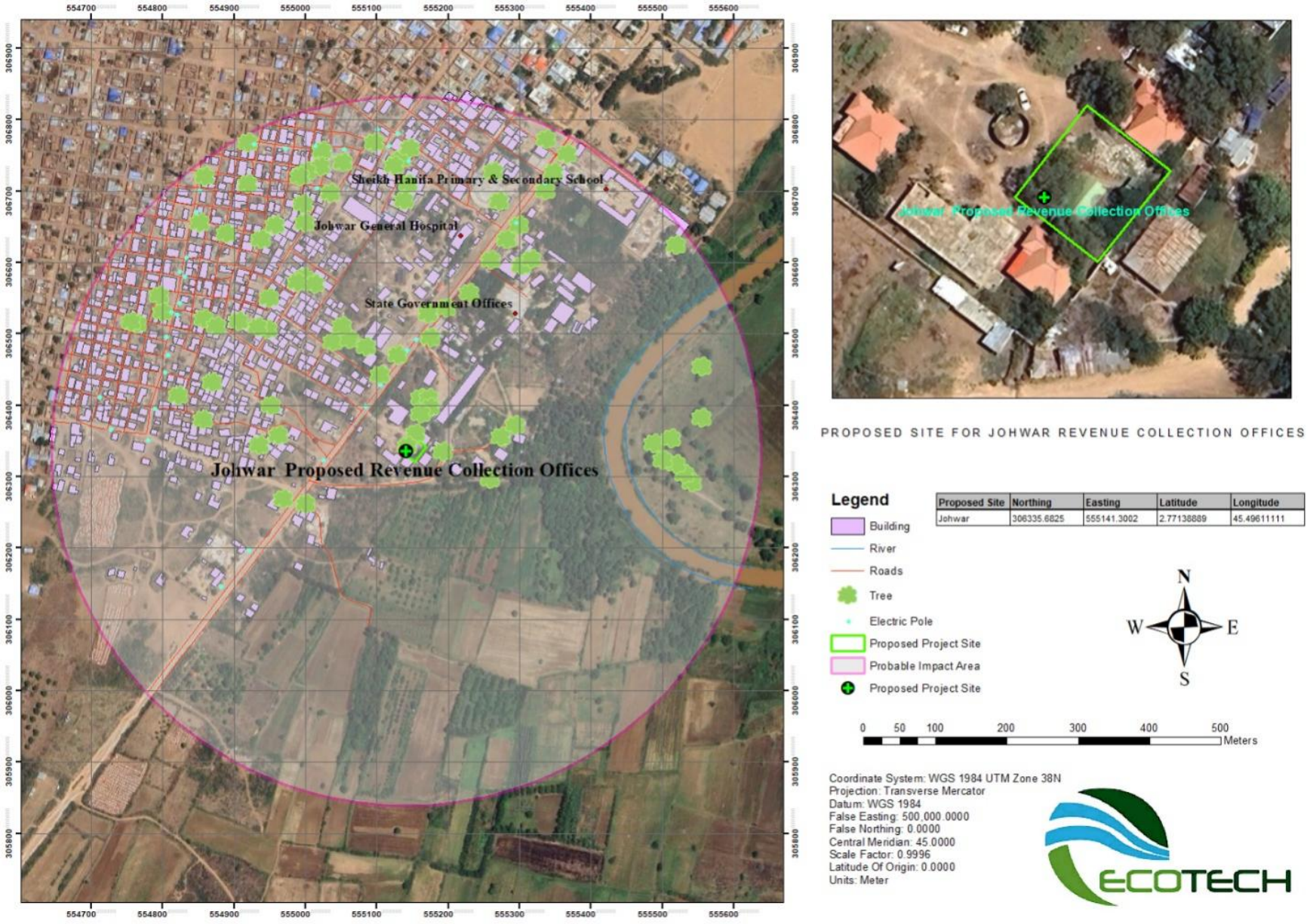

Image 3-3: Location Map of Johwar Site

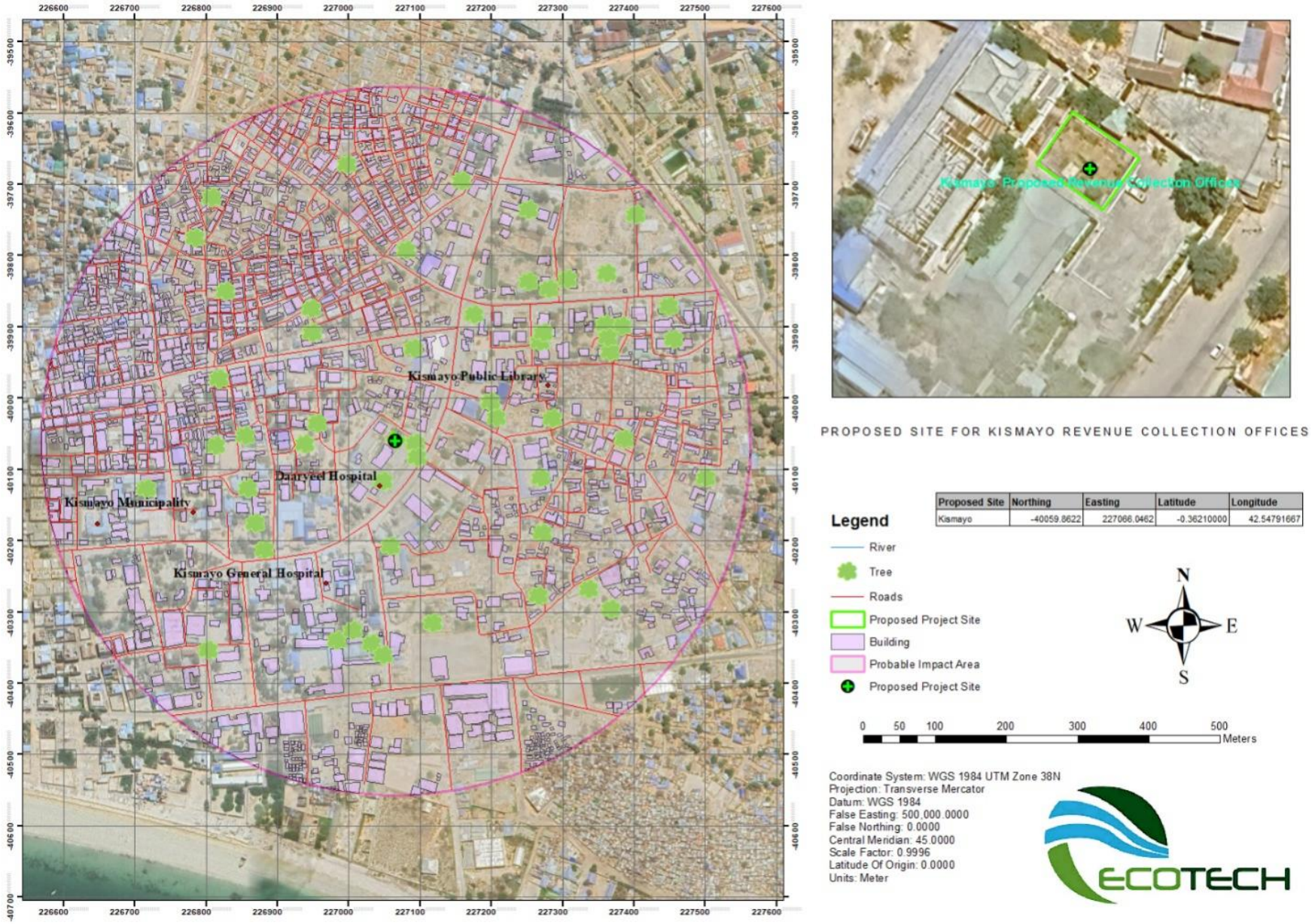

Image 3-4: Location Map of Kismayo Site

2.3. General Site Layout, Size, Capacity & Functional Allocation

2.3.1. Dhuusamareb -Galmudug State

The project site, measuring 72m x 60m, is located within the Ministry of Finance premises and is well-integrated with surrounding government facilities. The building layout prioritises universal accessibility, natural lighting, and efficient space utilisation. The design accommodates a mix of separate and work-pool office typologies, treasury safe storage areas and multiple meeting spaces across the ground and first floors.

The upper levels include five executive ensuite offices for senior leadership, while rooftop provisions are made for solar photovoltaic panels with an integrated power distribution system. Each floor will have a dedicated electrical room, alongside fire escape facilities and lifts to ensure safe and efficient circulation. The building design also incorporates sustainability measures, environmental considerations and adaptability for future neighbouring developments.

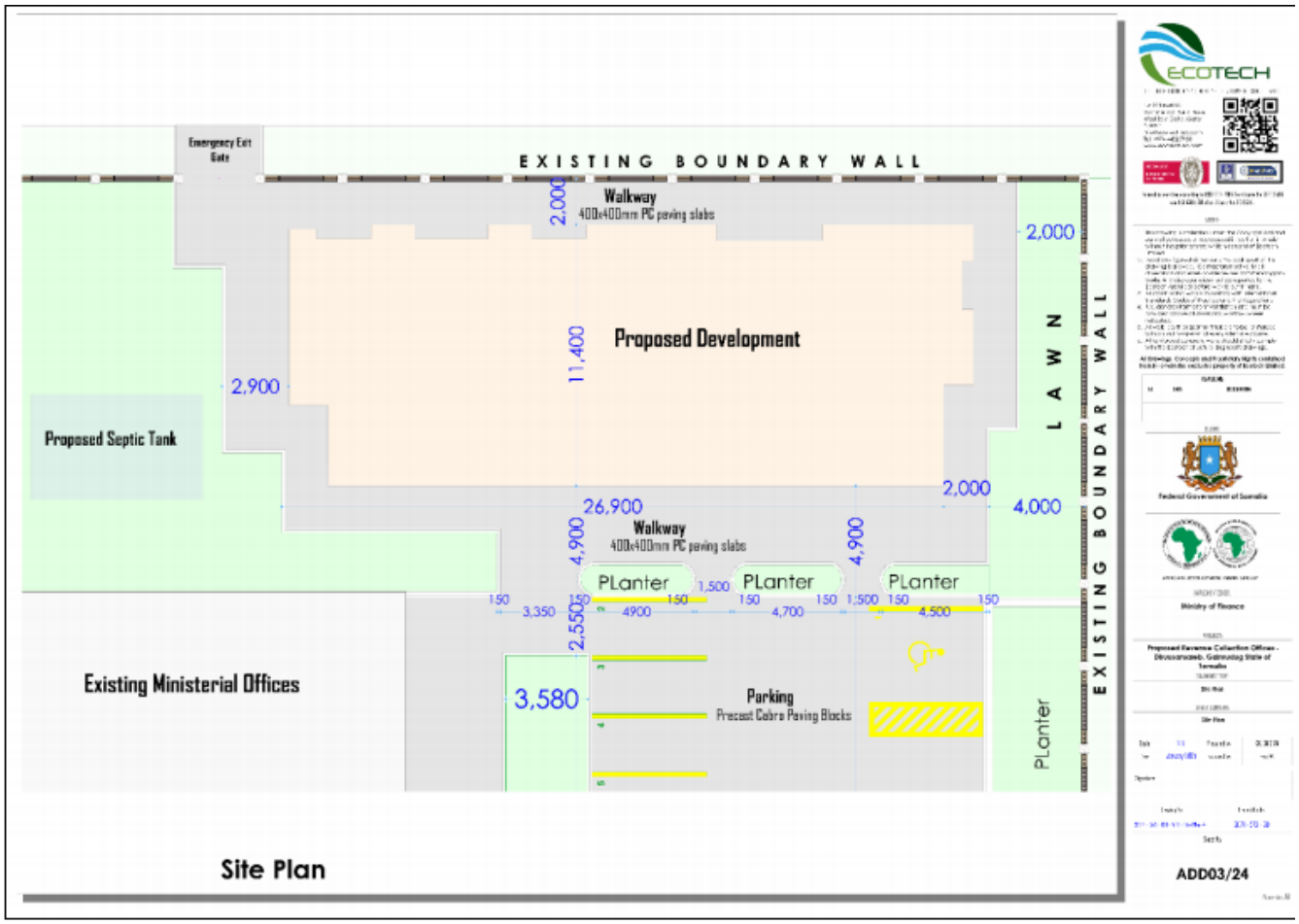

Image 3-5: Dhuusamareb Site Layout

2.3.2. Kismayo -Jubbaland State

The proposed revenue collection office will be constructed on a 20m x 18m parcel of land located within the Ministry of Finance premises. The building layout will respect plot setbacks to allow for circulation and service access around the structure. The design will prioritize universal accessibility, natural lighting for the public lobby and reception, and integration of sustainability and environmental considerations.

The two-storey facility will accommodate departmental offices, meeting rooms and staff workspaces on the lower levels, with executive offices provided on the upper floor. Ancillary provisions include a rooftop terrace for informal activities, dedicated service ducts for water, electricity and solid waste on each floor, as well as fire escapes and adequate lift capacity. Backup power will be supplied by a generator, while security checkpoints will be strategically positioned as per client requirements.

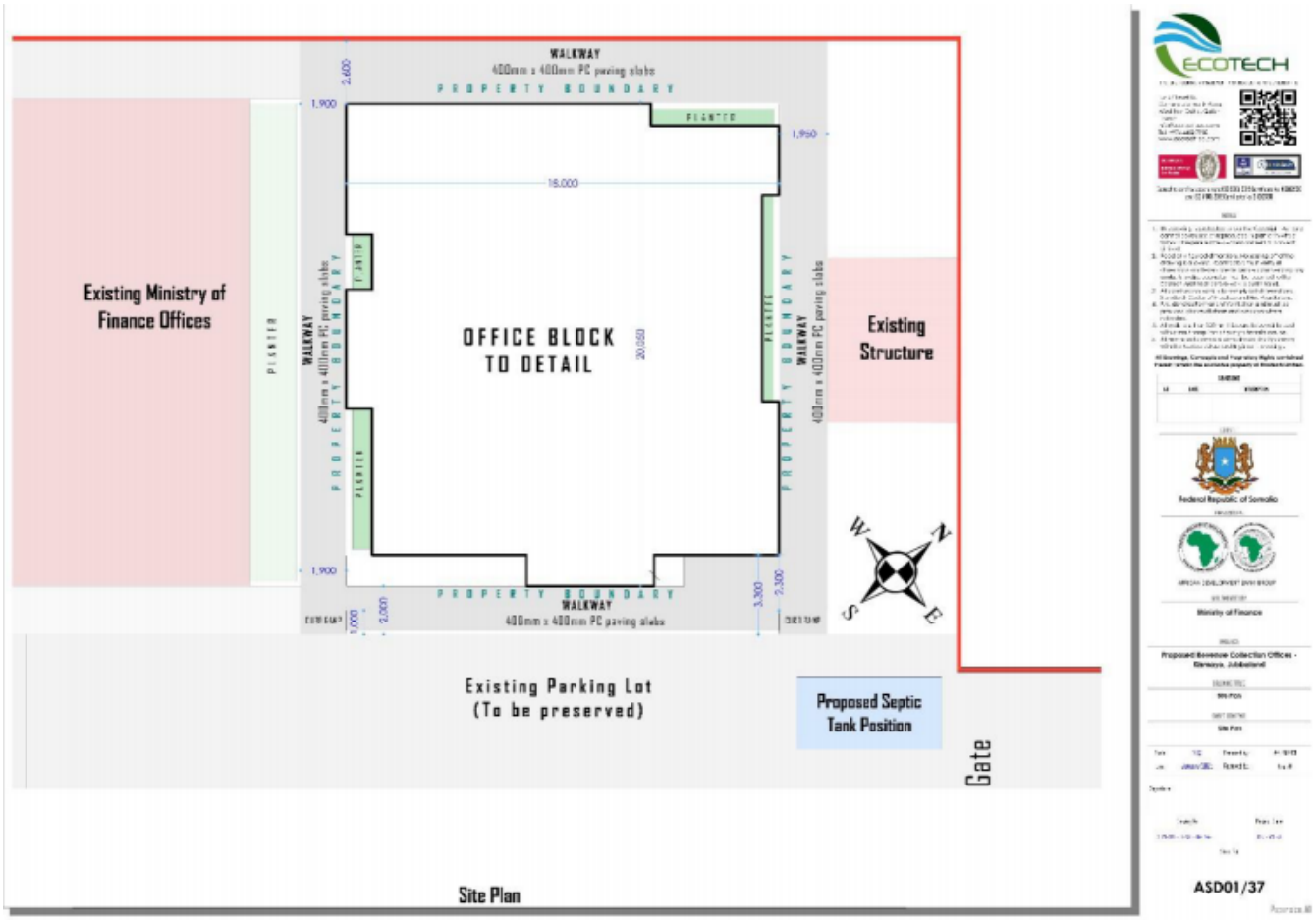

Image 3-6: Kismayo Site layout

2.3.3. Johwar- Hirshabelle State

The project site, measuring 26m x 21m, is located within the Ministry of Finance premises. The site is surrounded by existing government buildings, including the Ministry of Finance offices. The three-storey building will comprise departmental offices, meeting rooms and a kitchenette on the lower floors, with executive offices, treasury and security rooms, and technical spaces (server, CCTV, and electrical management rooms) distributed across the upper floors.

Additional provisions include fire escapes, lift access, a rooftop terrace and a sentry tower for enhanced security. Interlocking paving blocks will connect the main gate to the parking area, ensuring smooth vehicular and pedestrian movement in all weather conditions. The design also incorporates universal accessibility, natural lighting, sustainability and environmental considerations to promote functionality, safety, and efficiency.

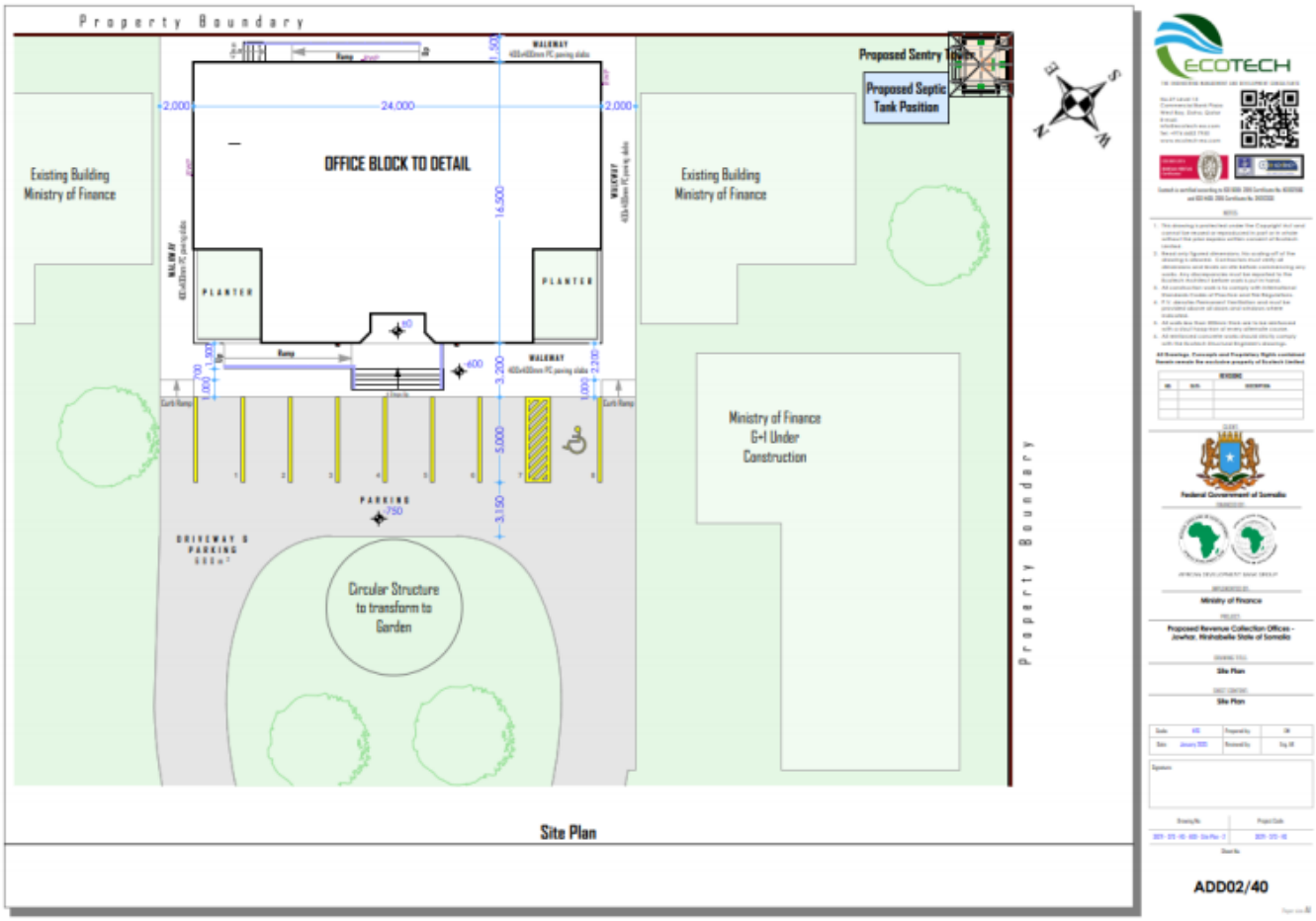

Image 3-7: Johwar Site Layout

2.3.4. Baidoa-Southwest State

The proposed development, situated within an irregular master plan, features a multi-level office complex. The Ground and First Floors will house six work-pool office units, each paired with managerial offices, alongside treasury safe rooms, meeting and training facilities and a kitchenette. The Second Floor is designated for five executive offices, complete with secretarial and security support spaces, intended for senior officials including the Minister of Finance, Deputy Minister and Director General. Site security will be ensured through a perimeter wall, four watchtowers and on-site staff accommodation for security and operations personnel.

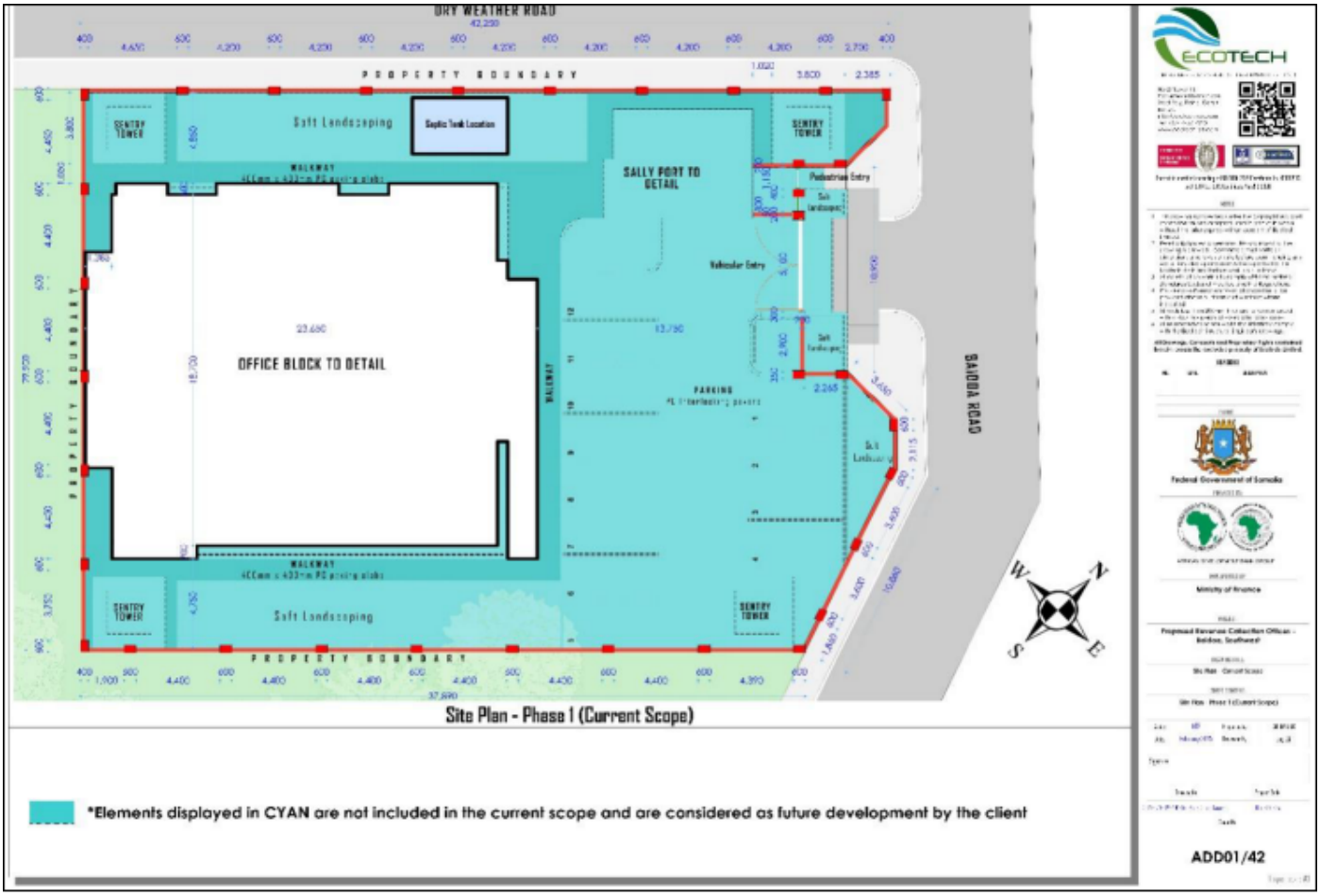

Image 3-8: Baidoa Site Layout

2.4. Project Components

2.4.1. Dhuusamareb

- *Building Type:* A modern two-storey revenue collection office, replacing small and congested rented premises, to provide adequate working space for staff.
- *Office Layout*: Six work-pool office units with attached managerial spaces on the Ground and First Floors, ensuring efficient operations and teamwork.
- *Executive Offices*: Five en-suite executive offices on the Second Floor for senior officials (Minister, Deputy Minister, State Minister, Director General), with secretarial and security offices to support high-level functions.
- *Facilities*: A well-lit public reception area, meeting and training rooms, and a kitchenette to serve staff and visitors.
- *Security*: A boundary wall with four watchtowers and staff accommodation to safeguard operations and personnel.
- *Services*: To meet safety and service standards, electrical rooms on each floor, service ducts for water and waste, lifts, and fire escape facilities will be provided.

- *Sustainability*: A rooftop terrace fitted with solar photovoltaic panels to supply renewable energy and reduce reliance on the grid.

2.4.2. Kismayo

- *Office Layout*: Six work-pool offices and managerial spaces designed for efficient staff organization and service delivery.
- *Executive Offices*: Five en-suite executive offices on the Second Floor, supported by secretarial and security spaces to facilitate smooth leadership operations.
- *Facilities*: Public lobby and reception designed with natural lighting, meeting spaces and a kitchenette to improve staff welfare.
- *Security*: A reinforced boundary wall, four watchtowers, and security staff housing to ensure the facility remains secure.
- *Services*: Electrical, water and solid waste service ducts on each floor; fire escapes; lifts and CCTV to enhance functionality and safety.
- *Sustainability*: Installation of rooftop solar PV panels to power operations sustainably.

2.4.3. Jowhar

- *Building Type*: A two-storey revenue collection office located within a government compound that also hosts other ministries, ensuring strategic integration with state institutions.
- *Office Layout*: Work-pool offices and treasury safe storage on the Ground and First Floors, providing secure and efficient workspaces.
- *Executive Offices*: Five en-suite senior executive offices on the Second Floor, with support offices for secretarial and security staff to improve administration.
- *Facilities*: Spacious reception, training/meeting rooms, and kitchenette facilities to accommodate staff and visitors.
- *Security:* A perimeter boundary wall, four watchtowers, and staff accommodation for operations and security staff.
- *Services:* Electrical rooms per floor, service ducts, lifts, and fire escape provisions to ensure compliance with modern building standards.
- *Sustainability*: Rooftop solar PV panels and a terrace providing renewable energy and informal staff space.

2.4.4. Baidoa

- *Building Type*: A two-storey revenue collection office strategically located along Baidoa Road, designed to replace congested and rented spaces with a permanent modern structure.
- *Office Layout*: Six work-pool offices on the Ground and First Floors, each with managerial units, complemented by treasury safes for secure storage.
- *Executive Offices*: Five en-suite executive offices on the Second Floor, including offices for senior officials, supported by secretarial and security staff spaces.
- *Facilities*: Reception and lobby area with natural lighting, conference and meeting rooms, and a kitchenette to enhance staff and visitor experience.
- *Security*: A strong boundary wall with four watchtowers and staff quarters to safeguard the premises and personnel.

- *Services*: Modern infrastructure including electrical rooms, water and waste ducts, lifts, fire escapes, and CCTV.
- *Sustainability*: Rooftop solar PV installation to reduce energy costs and improve environmental performance.

2.5. Project Phases

The implementation of the revenue collection office projects across the federal states will progress through four distinct phases: pre-construction, construction, post-construction/operation and decommissioning. Each phase has unique activities and associated environmental and social aspects that must be managed carefully to ensure compliance with national regulations and safeguard policies.

2.5.1. Pre-Construction Phase

The pre-construction phase involves all planning and preparatory activities before physical works begin. Key activities include:

- *Feasibility Studies and Site Investigations*: Comprehensive assessments to determine soil conditions, topography, drainage patterns, and utility availability. These investigations inform engineering design and reduce unforeseen risks.
- *Detailed Design and Planning*: Preparation of final architectural and structural designs, integrating environmental, safety, and accessibility considerations (e.g., fire safety, universal access, solar energy integration).
- *Permitting and Approvals*: Securing necessary clearances from environmental authorities, urban planning agencies, and relevant state ministries, in compliance with Somali national legislation and AfDB safeguard policies.
- *Stakeholder Engagement and Disclosure*: Informing local communities, institutions and relevant government offices of the project's scope, benefits, and possible disruptions. This phase included collecting feedback to incorporate into project planning.
- *Procurement and Contracting*: Mobilizing contractors, sourcing construction materials and setting up supply chains. Procurement will prioritise locally available resources where possible to reduce costs and enhance community benefits.
- *Site Preparation for Mobilisation*: Setting up temporary facilities such as storage yards, site offices, sanitation facilities and security fencing before the start of works.

2.5.2. Construction Phase

This phase constitutes the core physical works of the project and is expected to have the most significant environmental and social impacts if not well managed. Main activities include:

- *Demolition and Clearance*: this will involve safe demolition of temporary structures in Baidoa, Johwar, Dhuusamareb and Kismayu and proper disposal of debris following environmental standards.
- *Site Preparation*: Involves activities such as leveling, excavation, foundation works and installation of drainage systems.
- *Structural Construction*: Use of reinforced concrete frames, masonry walls, roofing and finishing works.
- *Installation of Utilities and Services*: Integration of electrical systems, water supply, sanitation, fire safety, ICT cabling, lifts, solar photovoltaic panels and solid waste ducts.

Landscaping and External Works: Construction of access roads, parking areas, pedestrian pathways, boundary walls and watchtowers.

- *Occupational Health and Safety Management*: Implementation of PPE requirements, safety training, controlled access to construction sites and emergency preparedness plans.
- *Environmental Mitigation*: Dust suppression, noise control, proper waste disposal, and pollution prevention measures will be prioritized.
- *Community Liaison*: Ongoing engagement with local residents and institutions to address grievances and manage disruptions such as road access or noise.
- *Environmental and Social Considerations*: Risks include air and noise pollution, soil erosion, solid and liquid waste generation, occupational injuries, traffic congestion and temporary disruption to surrounding communities.

2.5.3. Post-Construction / Operation Phase

Following construction, the buildings will be commissioned and handed over for occupation and use. Activities at this stage include:

- *Testing and Commissioning*: Inspection and verification of installed systems (electrical, mechanical, plumbing, ICT, solar PV) to ensure compliance with standards.
- *Handover to Client*: Formal transfer of the facilities to the Ministry of Finance at each state level.
- *Operationalization of Offices*: The offices will be occupied by revenue staff and used for revenue collection, administration and public service delivery.
- *Maintenance and Repairs*: Regular inspection and preventive maintenance of structures, utilities and security systems to prolong building lifespan.
- *Waste and Resource Management*: Implementation of efficient waste handling practices, energy conservation measures through solar integration and water efficiency initiatives.
- *Environmental and Social Safeguards:* Ensuring continuous compliance with occupational health and safety requirements, universal accessibility and grievance redress mechanisms during building use.
- *Environmental and Social Considerations*: Increased human activity may generate waste, require reliable sanitation and create additional demand on water and power supply. Proper planning will ensure sustainable operation.

2.5.4. Decommissioning Phase

While decommissioning is not anticipated in the near term, it remains an important consideration in the project lifecycle. Key activities would include:

- *Closure Planning*: Developing a plan for safe shutdown of offices when they reach the end of their useful life or if replaced by newer facilities.
- *Demolition and Material Removal*: Controlled demolition of structures using safe methods, minimizing dust and noise impacts.
- *Material Recovery and Recycling*: Reusing or recycling construction debris, metals, and other materials where feasible to reduce landfill waste.
- *Site Rehabilitation*: Restoring the land to a stable and environmentally safe condition, which may include replanting vegetation or preparing the site for alternative use.

- *Stakeholder Engagement:* Consulting communities and authorities on preferred future uses of the site to align with local development priorities.

2.6. Project / Construction History

Historically, the Federal Member States have never had purpose built offices dedicated to revenue collection and administration. For many years, revenue authorities have operated from rented premises, which has limited efficiency, confidentiality and the ability to expand services in line with growing administrative needs. The lack of permanent infrastructure has also posed challenges in record keeping, security and coordination of revenue functions.

In Jowhar, revenue collection officers currently share office space with staff from the Ministry of Finance. This arrangement has constrained operations, created congestion and reduced the quality of service delivery to the public. Similar situations exist across the other states, where revenue offices remain temporary and dependent on leased buildings, often in unsuitable conditions.

Through the Institutional Support for Economic Governance Program, the Ministry of Finance, in collaboration with AFDB, has prioritized the construction of new, dedicated revenue offices in the Federal Member States. These offices will not only provide adequate and modern workspaces but also strengthen institutional capacity, promote transparency, and enhance revenue mobilization. The proposed project therefore marks the first step toward establishing permanent, state-owned revenue collection facilities in each of the states, signaling a significant milestone in Somalia's efforts to improve fiscal governance and service delivery.

2.7. Proposed Construction Schedule, Staffing and Support

The construction of the proposed Revenue Collection Offices across Johwar, Kismayo, Baidoa, and Dhuusamareb is planned to run over an estimated 12 months. No major demolition will be required since the sites currently host only small or temporary structures. Instead, site clearance and preparation will be carried out in the initial one month, involving removal of existing makeshift facilities, grading of the ground, debris disposal, boundary demarcation and installation of temporary fencing, utilities and access routes.

The main construction phase, spanning approximately 11 months, will cover foundation and substructure works, erection of the superstructure, roofing and external walling. Interior works such as partitioning, ceilings, tiling, joinery and finishes will be undertaken concurrently with Mechanical, Electrical, and Plumbing (MEP) installations. These will include water supply, sanitation, power distribution (including integration of solar photovoltaic systems), fire safety and ICT infrastructure. Treasury safe rooms, executive offices, work pool offices, meeting rooms and support spaces such as a kitchenette and staff amenities will be fitted to meet operational requirements. External works will cover drainage, paved access, parking areas and installation of security features such as boundary walls, gates and watchtowers.

The final one month will be dedicated to testing, commissioning, and handover. This will include inspection of all building systems, verification of safety and accessibility measures, training of staff on the use of new facilities and certification of readiness for occupation.

Implementation will be supported by a multidisciplinary team, including architects, civil and structural engineers, quantity surveyors, health and safety officers and environmental and social safeguards specialists. A project management team will oversee coordination, quality control and compliance with both national standards and environmental and social mitigation measures identified in the ESIA. Skilled and semi-skilled labourers will form the core of on-site staff, supported by site supervisors and construction managers.

To enable smooth operations, temporary site offices, storage spaces, water and sanitation facilities and power supply systems will be established at each location. Strict enforcement of Occupational Health and Safety (OHS) requirements will be maintained throughout, alongside close monitoring of environmental and social safeguards to minimize disruption to nearby communities.

2.8. Facilities and services

2.8.1. Health Facilities

Access to health facilities is an important consideration for safeguarding occupational health and safety during the construction and operational phases of the proposed Revenue Collection Offices. The proximity and adequacy of medical services vary across the four project sites:

- **Kismayo:** The project site benefits from close proximity to health services, with a health facility located within 100 meters. This ensures that any health-related incidents or emergencies during construction can be managed with minimal delays.
- **Johwar:** A functional health centre is located approximately 200 meters from the project site. This offers relatively convenient access to medical care, although a temporary on-site first aid station will still be essential for immediate response to workplace incidents.
- **Dhuusamareb:** The nearest referral hospital is located at a considerable distance from the project site. This poses challenges for emergency response, necessitating strong mitigation measures, including the provision of a well-equipped on-site first aid station, arrangements for rapid transportation and a formal referral agreement with the hospital.
- **Baidoa:** Like Dhuusamareb, the nearest health facility is located at a significant distance from the project site. This creates potential risks in emergencies and requires establishment of a temporary on-site first aid unit supported by trained OHS personnel, as well as a clear emergency referral and transport system.

Across all sites, the provision of a temporary first aid station, equipped with essential supplies and managed by trained personnel, will be necessary. Where facilities are farther away (Dhuusamareb and Baidoa), additional arrangements such as standby vehicles or motorbikes and referral agreements with nearby hospitals will be critical to ensuring worker welfare and minimizing disruptions to construction activities.

2.8.2. Water Requirements

Water will be a critical resource throughout the construction of the Revenue Collection Offices across the four states. The main areas of demand will include:

- *Construction Activities*: Water will be used for concrete mixing, curing, dust suppression, and cleaning of tools and machinery. Effective dust control will be prioritized to protect both workers' health and surrounding communities.
- *Domestic Consumption*: Safe drinking water and water for handwashing, sanitation, and cleaning will be provided to all workers to maintain hygiene and reduce risks of waterborne diseases.
- *Sanitation Services*: Ablution blocks and toilets at the construction sites will require a steady water supply. The use of water-efficient fittings will be encouraged to limit wastage.
- *Fire Safety*: Storage tanks and fire hydrants (or extinguishers where hydrants are not feasible) will be made available to ensure adequate fire prevention and response capacity.

2.8.3. Electricity Requirements

Reliable electricity will be essential to support day-to-day construction activities. Energy use will cover:

- *Construction Equipment*: Powering mixers, cutting machines and other tools.
- *Site Facilities*: Lighting, computers and office equipment in site offices and worker accommodation areas .
- *Security and Lighting*: Adequate lighting for night works and perimeter security will be ensured through portable light towers or permanent installations.

2.8.4. Solid Waste Management

The construction of the Revenue Collection Offices is expected to generate different types of solid waste, which will be managed in line with best practices and local regulations. Anticipated waste streams include:

- *Excavated Material*: Soil and earth from site clearing and leveling, to be reused in backfilling or landscaping wherever possible.
- *Packaging Waste*: Wrappers, cartons and straps from delivered construction materials.
- *Wood and Metal Off-Cuts*: From scaffolding, formwork, reinforcement bars and other structural works.
- *Demolition Debris*: Limited in this case, as existing small temporary structures may be removed. Debris such as concrete and bricks will be safely collected and reused or disposed of appropriately.
- *Sanitary Waste*: From worker facilities, to be regularly collected and disposed of in designated municipal sites.

2.9. Project Activities/Operations

The proposed project will consist of a sequence of interlinked activities carried out during the pre-construction, construction, and post-construction (operational) phases. Each phase will require distinct inputs, resources, and management strategies to ensure smooth execution, compliance with environmental and social safeguards, and the protection of workers and surrounding communities. Below is an outline of the main activities anticipated throughout the project lifecycle:

2.9.1. Pre-Construction Phase Activities

This stage entails all planning, assessments, and mobilisation activities before any physical works commence.

- *Site and Technical Investigations*: Conducting final evaluations of the site, including soil tests, geotechnical studies, and mapping of underground and overhead utilities.
- *Permits and Approvals*: Securing approvals from relevant government agencies, local authorities and the financing body (AfDB), including construction, demolition, and environmental permits.
- *Final Design Confirmation*: Reviewing and finalizing architectural drawings, structural layouts, and service designs (mechanical, electrical, and plumbing).
- *Environmental and Social Compliance*: Finalising, disclosing and adopting the ESIA and developing the Environmental and Social Management Plan (ESMP).

- *Procurement and Contracting*: Engaging contractors, consultants and suppliers for both demolition and construction phases.
- *Stakeholder Engagement*: Carrying out community awareness sessions, addressing concerns, and ensuring transparency with stakeholders.
- *Site Preparation and Mobilisation*: Establishing temporary site offices, storage areas, worker facilities and access points.
- *Utility Disconnections*: Safely disconnecting existing water, power, and communication lines to prepare the site for redevelopment.

2.9.2. Mobilisation of Team and Resources

Mobilization marks the onset of on-the-ground project activities. It includes deploying the project team, construction machinery, raw materials, and temporary facilities to the site. Key staff such as the Project Manager, Site Engineer, Health and Safety Officer, Environmental Safeguards Officer and Supervisors will be stationed at the site. Skilled and unskilled workers will also be engaged, with preference given to local hires.

Before commencing work, all personnel will undergo induction training on occupational health and safety, environmental protection, site rules, emergency preparedness, and prevention of gender-based violence and harassment.

Heavy equipment like excavators, mixers, scaffolding, generators and lighting towers will be brought in and inspected for compliance. Initial deliveries of construction materials (cement, steel, aggregates, timber, etc.) will be received and securely stored.

Temporary site infrastructure will be established, including mobile offices, meeting shelters, toilets, wash stations, drinking water points and resting sheds. Utilities such as water and electricity will be provided through municipal connections, generators, or bowsers. Where possible, solar power will supplement site lighting and charging.

In addition, fire extinguishers, safety signage, first aid kits, and waste bins will be provided to ensure workplace safety and environmental protection. Dust suppression, noise reduction, and restricted access will be implemented in line with the ESMP.

2.10. Construction Phase Activities

This phase covers the complete construction of the new Revenue Collection Offices, which will be delivered through a series of sequential and, at times, overlapping work packages:

2.10.1. Site Preparation

The initial stage of construction involves preparing the ground for development. Activities will include land grading, leveling and compacting to provide a stable base for the foundation. Temporary utilities such as water connections, electricity supply, site lighting and sanitation facilities will be established. Surface drainage channels will be put in place to manage stormwater. Primary construction materials (cement, gravel, sand, steel, and prefabricated items) will be transported and stored on-site using trucks and heavy machinery to ensure materials are available when needed.

2.10.2. Substructure Works

This phase focuses on the foundation works necessary to anchor the building. Excavation and trenching will be undertaken for foundations, underground utilities, and any basement structures. Reinforced concrete footings and slabs will then be cast to form a stable base. Once these works are

complete, backfilling and compaction will follow around the foundations to enhance durability and structural integrity.

2.10.3. Superstructure Works

Superstructure construction involves the vertical progression of the building. Reinforced concrete columns, beams, slabs, staircases, and elevator shafts will be erected, floor by floor, until the full height of the office block is achieved. Roof slabs and architectural features, such as skylights or parapets, will be included at this stage. Continuous delivery of reinforcement bars, formwork and concrete will support uninterrupted work.

2.10.4. Building Envelope

The external envelope of the building will be developed to protect the interior spaces and enhance aesthetics. External walls will be constructed using blockwork or precast panels, followed by installation of windows, doors and façade elements to ensure weather protection and security. External finishes such as plastering, cladding, or painting will provide durability and improve visual appeal.

2.10.5. Mechanical, Electrical, and Plumbing (MEP) Installations

This stage integrates essential building services. Electrical systems will cover wiring, sockets, lighting and backup power infrastructure. Plumbing works will include pipework for water supply, toilets and drainage systems. HVAC installations for heating, cooling and ventilation will be fitted, together with fire safety systems (detectors, alarms and extinguishers). Information and communication systems including the internet, networking and telephone lines will also be installed.

2.10.6. Interior Works and Fit-Out

Attention will then shift to the interior spaces. Works will include ceilings, partitions, flooring (tiles, carpet, or vinyl), painting and finishing. Furniture, shelving, storage systems and ICT infrastructure will be set up. Security enhancements such as CCTV, biometric access and internal signage will also be put in place, ensuring the offices are functional and professional.

2.10.7. External Works

This stage focuses on external infrastructure and landscaping. Parking lots, internal roads, walkways and ramps will be constructed to improve access. Security features such as perimeter fencing, guardhouses and automated gates will be added. Stormwater drainage systems and external lighting will also be installed. Landscaping with trees, lawns and ornamental plants will enhance the environment and create a welcoming atmosphere.

2.10.8. Testing and Commissioning

The final stage involves inspection, testing and commissioning of all systems to ensure compliance with design and operational requirements. Electrical, plumbing, HVAC, and fire systems will be tested under real conditions. Any defects will be corrected before handover. Staff responsible for facility management will be trained on the operation and maintenance of installed systems. Final cleaning and removal of construction waste will prepare the facility for use by the Revenue Collection Offices.

2.10.9. Anticipated Project Workforce and Working Hours

Construction is expected to engage over 50 workers per site at peak activity, including skilled professionals and casual labourers. At least 60% of the workforce will be sourced locally to enhance

community ownership, generate income opportunities, and foster goodwill toward the project. Working hours will align with the employment laws and labour standards of the Federal Government of Somalia.

2.11. Operation Phase Activities

The operation phase will begin after the successful completion, testing, and formal handover of the new Revenue Collection Offices. This stage is dedicated to the effective use, upkeep, and management of the facilities to guarantee efficiency, safety, and sustainability. The main activities expected during this phase include:

2.11.1. Occupancy and Use

The offices will be occupied by revenue officers and related administrative staff. The buildings will provide modern workspaces to support revenue collection, data management, compliance monitoring, and other financial governance functions. The design allows for both staff offices and customer service areas to facilitate smooth public interactions.

2.11.2. Routine Maintenance and Repairs

To preserve the quality and functionality of the facilities, regular maintenance will be carried out. This includes cleaning, periodic servicing of electrical, plumbing,and ICT systems, inspection of water and sanitation facilities, and timely repairs of any defective components. Preventive maintenance will be emphasized to avoid costly breakdowns and ensure uninterrupted service delivery.

2.11.3. Safety and Security Monitoring

The premises will be continuously monitored to guarantee safety for staff, visitors, and assets. Measures will include surveillance through CCTV, controlled entry points, deployment of security personnel, and regular fire and emergency preparedness drills. All fire extinguishers, alarms, and emergency exits will be kept in good working order.

2.11.4. Waste Management

Daily waste, including office paper, packaging materials, and domestic refuse from staff and visitors, will be properly collected, segregated, and disposed of. Recycling practices will be promoted, and arrangements made for safe disposal of non-recyclables through approved municipal systems.

2.11.5. Facility Management

Trained facility management staff or outsourced service providers will be tasked with managing building operations. This will cover oversight of backup power systems, ICT infrastructure, water supply, sanitation facilities, and other building services. Their role will be to minimize disruptions and ensure reliable and efficient service delivery.

2.11.6. Public and Community Engagement

The Revenue Collection Offices will serve as a public-facing facility where citizens interact directly with government services. A professional and welcoming environment will be maintained to handle tax inquiries, payment processing, and other service delivery. This engagement will not only enhance public confidence in government institutions but also promote transparency and accountability in revenue collection.

2.12. Required Off-site Investments

To ensure the successful construction and efficient operation of the new Revenue Collection Offices, several supporting off-site interventions will be necessary for each site. These investments will complement the core project and guarantee uninterrupted service delivery. Key requirements include:

- **Provision of Utilities:** The offices will need to be connected to reliable external services, including electricity, clean water supply, and telecommunication networks. In some cases, extensions or upgrades to existing lines will be required to accommodate the additional demand created by the facilities.
- **Enhancement of Access Routes:** The approach roads and footpaths leading to the sites may require light upgrading to support the movement of construction equipment and, later, to provide safe and convenient access for staff and the public. This may involve resurfacing, leveling, or installing proper drainage where necessary.
- **Waste Management Linkages:** Arrangements will be put in place with municipal councils or accredited private service providers for the collection, transportation, and disposal of waste generated during both the construction and operational phases. The aim will be to ensure environmentally sound handling of refuse in compliance with national and local regulations.
- **Drainage and Stormwater Management:** Improvement of nearby drainage channels to prevent flooding and waterlogging, which could affect access to the offices and surrounding areas.
- **ICT and Data Infrastructure:** Extension of internet connectivity and secure data transmission systems to ensure revenue systems are integrated with central government platforms.

2.13. Anticipated Life Span of the Proposed Revenue Collection Offices

The proposed Revenue Collection Offices in Johwar, Kismayo, Dhuusamareb, and Baidoa are being planned and constructed with durability, resilience and long-term service delivery in mind. Designed in accordance with modern engineering standards and using high-quality, locally adaptable materials, each office is expected to have a life span of at least 50 years, provided that routine maintenance, timely repairs and periodic upgrades are undertaken.

This life expectancy ensures that the offices will continue to provide a safe, functional and efficient working environment for revenue officers and members of the public who rely on their services. By incorporating sustainable building techniques and infrastructure systems, the facilities are built to withstand environmental stresses while remaining adaptable to future technological advancements in revenue collection and public financial management.

3. POLICY, ADMINISTRATIVE AND LEGAL FRAMEWORK

The implementation of the proposed Revenue Collection Offices project will be anchored within a comprehensive legal, policy and institutional framework that ensures environmental sustainability, social accountability and regulatory compliance. This framework brings together the national laws and regulatory instruments of the Federal Republic of Somalia, state-level provisions and the African Development Bank's (AfDB) environmental and social safeguard policies, which are compulsory for all AfDB-financed projects. In addition, the framework incorporates internationally recognised standards and best practices in environmental and social management.

Together, these instruments form the legal and operational foundation for conducting Environmental and Social Impact Assessments (ESIAs), safeguarding natural resources, advancing social equity and ensuring that infrastructure development aligns with national priorities and international sustainability goals.

This chapter presents an overview of the most relevant laws, policies and institutional mandates applicable to the project. In addition to outlining these frameworks, it highlights the specific relevance of each instrument to the proposed Revenue Collection Offices, thereby clarifying how they guide project planning, approval, implementation and monitoring. It also provides an assessment of institutional capacity at both federal and state levels, with a particular focus on decentralization, readiness and the ability to support effective compliance and oversight throughout the project lifecycle.

3.1. National Legal Framework

3.1.1. The Provisional Constitution of the Federal Republic of Somalia (2012)

The Provisional Constitution of the Federal Republic of Somalia (2012**)** is the highest legal authority in the country and provides the overarching framework for governance, environmental protection, and social equity. As the supreme law, it establishes guiding principles for development projects, including the proposed Revenue Collection Offices, ensuring that such initiatives are consistent with sustainability, human rights, and institutional accountability.

The Constitution explicitly recognizes the right of citizens to a clean and healthy environment. Article 25(1) states that "every person has the right to an environment that is not harmful to their health and well-being." This provision creates a binding obligation on both the Federal Government and Member States to ensure that development projects prevent environmental degradation, manage waste responsibly, and safeguard public health.

In addition, the Constitution affirms the role of government in managing natural resources for the benefit of all citizens. Article 43(1) provides that natural resources belong to the people and shall be held in trust by the government. This ensures that exploitation and utilization of resources, including land, water, and minerals, must align with sustainability principles and intergenerational equity.

Decentralization is another critical pillar of the Provisional Constitution.Article 54 outlines the distribution of powers between the Federal Government and Federal Member States, giving both levels of government authority over natural resource management and environmental regulation. This shared responsibility is particularly relevant for Environmental and Social Impact Assessments (ESIAs), as oversight and compliance will require coordination between federal institutions and state authorities where the revenue offices will be constructed.

Equally important is the Constitution's emphasis on transparency and public participation. Article 32(1) guarantees the right of every citizen to access information held by public institutions, while Article 32(2) ensures that citizens have the right to participate in decisions affecting their environment, and

livelihoods. This establishes a constitutional mandate for stakeholder consultations and disclosure of information throughout the ESIA process, reinforcing accountability and inclusivity in project planning and implementation.

Relevance to the Project:

The Constitution of the Federal Republic of Somalia serves as the overarching legal framework that informs all environmental and social governance in the country. Article 25 guarantees the right of every person to a clean and healthy environment. In line with this constitutional obligation, the Environmental and Social Impact Assessment (ESIA) for the proposed Revenue Collection Offices ensures that the project complies with national environmental safeguards while promoting sustainable use of resources. This affirms the project's commitment to protecting present and future generations' health, safety, and well-being through environmentally responsible infrastructure development.

3.1.2. The Somalia national Environmental Policy (NEP 2019)

The Somalia National Environmental Policy (2019) provides the country with a comprehensive framework for protecting the environment while fostering sustainable development. Its overall goal is stated as *"to improve and enhance the health and quality of life of the Somali people and to promote sustainable development through sound management of the natural resources of the country."* The policy is grounded in several guiding principles, including the recognition that environmental protection is a fundamental human right. As highlighted in the policy, human rights and the environment are closely linked, and all citizens are entitled to a healthy and productive life in harmony with nature, consistent with Article 25 of the Provisional Constitution.

Other principles emphasized by the policy include sustainable development, public participation, the precautionary principle, and the polluter-pays principle. The policy underscores that natural resources must be used in a way that does not compromise their availability for future generations. It further stresses that people must be consulted and involved in decisions affecting their environment, and that precautionary measures should be applied where there is a threat of serious or irreversible damage, even in cases of scientific uncertainty. In addition, the polluter-pays principle assigns responsibility to those causing environmental damage to cover the costs of remediation.

The policy also sets out critical environmental instruments to be used in Somalia, with Environmental Impact Assessment (EIA) placed at the center. As noted in Chapter Six of the policy, EIA is mandatory for major projects and serves as a tool for screening, identifying, and managing potential environmental and social risks. It requires follow-up monitoring and evaluation to ensure that recommended mitigation measures are implemented effectively.

Furthermore, the policy addresses sectoral and cross-cutting issues that are directly relevant to infrastructure development, including waste management, air and noise pollution, and water contamination. It emphasizes that urban projects, particularly those involving construction, must incorporate pollution control systems, safe disposal methods, and environmental safeguards to protect both public health and ecosystems.

Relevance to Project (Short)

The Somalia National Environmental Policy (NEP 2019) is directly relevant to the proposed Revenue Collection Offices project. By making Environmental Impact Assessment mandatory for major developments, the policy provides the legal justification for this ESIA. The principle of environmental rights requires the project to uphold the health and wellbeing of nearby communities, while the precautionary and polluter-pays principles mandate that effective mitigation measures such as dust suppression, noise control, and proper waste management be put in place. Finally, the policy's emphasis on public

participation ensures that local communities are meaningfully engaged in the planning and monitoring of the project, reinforcing its alignment with national environmental governance objectives.

3.1.3. Environmental Protection and Management Act (2024)

The *Environmental Protection and Management Act (2024)* establishes Somalia's legal framework for environmental protection and sustainable development. It guarantees in Article 5 that *"every person living in Somalia shall have a right to clean, safe and healthy environment."* The Act is guided by principles outlined in Article 4, including the precautionary principle, polluter-pays, and sustainable development.

A key provision is the requirement for Environmental and Social Impact Assessments (ESIAs). Article 8 defines ESIA as a systematic process to determine potential adverse impacts, while Chapter 11 prescribes procedures for licensing, public participation, and compliance monitoring. The Act also empowers the Ministry of Environment and Climate Change under Article 12 to oversee policy, monitoring, and enforcement, with state ministries supporting implementation.

Compliance is reinforced through environmental audits (Articles 18–19) and inspection powers (Articles 20–21). Specific controls, such as on air and noise pollution (Article 26) and water pollution (Article 31), ensure projects minimize harmful impacts.

Relevance to the Project:

The Environmental Protection and Management Act (2024) is directly relevant to the proposed Revenue Collection Offices. By mandating ESIAs under Article 8 and Chapter 11, the Act provides the legal basis for this Environmental and Social Impact Assessment, ensuring that environmental risks are identified and mitigated prior to project implementation. The guarantees of a safe and healthy environment in Article 5 affirm the responsibility of the project to safeguard the wellbeing of workers, nearby communities, and the broader ecosystem. Provisions on pollution control (Articles 26 and 31) will guide the project in managing construction emissions, waste, and effluents, while oversight by the MoECC (Article 12) ensures compliance throughout the project lifecycle. In essence, this Act provides the binding legal framework that secures the project's environmental accountability, sustainability, and compliance with national laws.

3.1.4. Environmental and social Impact assessment (ESIA) Regulation (2024)

The Environmental and Social Impact Assessment (ESIA) Regulations, 2024 provide the principal regulatory framework for managing environmental and social safeguards in Somalia. These regulations operationalize the Environmental Management and Protection Act by laying out the procedures, standards, and responsibilities for conducting ESIAs. They apply to all public and private sector projects that may generate significant environmental or social impacts, ensuring that development is aligned with principles of sustainability, precaution, and public accountability (Article 3).

Under the Regulations, project proponents are required to prepare and submit an ESIA for review and approval by the Ministry of Environment and Climate Change prior to project implementation. The ESIA must assess anticipated environmental and social impacts, propose mitigation measures, and outline monitoring mechanisms to ensure compliance. This requirement is legally binding and ensures that environmental considerations are integrated into all stages of project planning and execution (Article 7).

Public participation is a central feature of the Regulations, which mandate that affected communities and stakeholders must be consulted throughout the ESIA process. This guarantees that the voices of

local populations are incorporated into project planning and that social equity and inclusivity are upheld in line with sustainable development objectives (Article 12).

Additionally, the Regulations assign clear institutional roles for enforcement. The Ministry of Environment and Climate Change holds the mandate for ESIA review, approval, and monitoring, while developers are obligated to comply with environmental permit conditions. Failure to comply attracts penalties, including suspension or revocation of project licenses, thereby strengthening accountability mechanisms (Articles 15 and 20).

Relevance to the Project:

For the proposed Ministry of Finance Revenue Collection Offices, the ESIA Regulations, 2023, establish the legal requirement to assess, mitigate, and monitor environmental and social impacts before project commencement. This ensures that construction and operation adhere to Somalia's sustainability goals, safeguard community well-being, and remain compliant with both national law and international best practice.

3.1.5. Somalia National Climate Change Policy (2020/2023)

The National Climate Change Policy (NCCP) of Somalia sets a framework for enhancing resilience and adaptive capacity of vulnerable communities and ecosystems to the adverse effects of climate change. Its goal is "to enhance resilience and improve the adaptive capacity of vulnerable Somali communities, the ecosystems on which they depend, to the adverse impacts of climate change in Somalia."

The policy is guided by several key principles including right to sustainable development, prioritization of vulnerable groups, regions and sectors, community ownership and participation, decentralized implementation, equity and social inclusion and mainstreaming climate change into national and regional planning.

Under its objectives, the NCCP emphasizes both adaptation and disaster risk reduction, and mitigation, especially in sectors like infrastructure, water, forests, biodiversity, urban settlements, and health. It calls for investments in resilient infrastructure, integration of adaptation into project design and promotion of low-carbon development where feasible.

Cross-cutting themes include capacity building, research & technology development, public awareness and ensuring that climate-change concerns are integrated across all relevant sector policies. Information management and stakeholder engagement are also highlighted.

Relevance to the Revenue Collection Offices Project

The NCCP is particularly relevant to the proposed Revenue Collection Offices because it requires that infrastructure developments incorporate climate resilience from the planning stage. For instance, since infrastructure is one of the sectors specifically named for adaptation in the policy, the design of these offices must anticipate climate risks (such as heat, rainfall variability, or extreme events) and include mitigation measures. The policy's emphasis on capacity building ensures that institutions and personnel involved in the project are prepared to manage climate impacts. Also, the guiding principles of equity, social inclusion and participation mean that the communities in Baidoa, Kismayo, Jowhar, and Dhuusamareb should be engaged in assessing vulnerabilities and shaping how the offices are constructed and operated to reduce climate-related risks.

3.1.6. Somali National Disaster Management Policy

The Somali National Disaster Management Policy provides a comprehensive framework for enhancing resilience and reducing the risks associated with natural and human-induced disasters. It emphasizes

disaster preparedness, mitigation, response, and recovery as essential components of sustainable development. The policy recognizes Somalia's vulnerability to recurrent hazards such as droughts, floods, cyclones, and conflicts and calls for mainstreaming disaster risk reduction measures into development planning and infrastructure projects.

Relevance to the Project:

The construction of revenue collection offices requires adherence to disaster management principles to safeguard lives, property, and public resources. In line with this policy, the project integrates considerations such as disaster-resilient building designs, fire and emergency preparedness measures and early warning systems. This ensures that the facilities remain functional and safe during potential emergencies, thereby contributing to national resilience and continuity of critical government services.

3.1.7. National Infrastructure Strategy (2019–2063)

The National Infrastructure Strategy provides a long-term roadmap for rebuilding and sustaining critical infrastructure to foster Somalia's stability and development. Its core objective is to rehabilitate, operate and maintain essential infrastructure that supports socio-economic growth, job creation, food security, climate resilience and cultural preservation. In the short term (first five years), the strategy aims to establish the foundational systems, institutions, standards, legal frameworks and resource mobilization mechanisms needed for resilient and inclusive infrastructure planning, urban development and long-term national transformation.

Relevance:

This strategy is highly relevant to the proposed project, as the construction of the Revenue collection offices contributes directly to the broader goal of establishing resilient public infrastructure. By aligning with the strategy, the project will not only enhance government service delivery but also support national infrastructure standards and address the current labour market demands by creating employment opportunities during construction and operation.

3.1.8. Somalia National Transformation Plan (NTP 2025-2029)

The *National Transformation Plan (NTP) 2025-2029* is a five-year strategic framework launched by the Federal Government of Somalia that sets out ambitious targets for economic growth, governance, social development, and environmental resilience. The plan is structured around four main pillars: Transformational Governance; Sustainable Economic Transformation; Social and Human Capital Transformation; and Environment and Climate Resilience. Key guiding principles include inclusivity and participation, transparency and accountability, sustainability and resilience, innovation, and collaboration between government, private sector, civil society, and international partners.

Under the Environment and Climate Resilience pillar, the NTP emphasizes strengthening climate-adaptation and disaster-risk management, environmental protection, and sustainable resource management. The Plan also calls for improved infrastructure development and resilience in design, integrating environmental and climate considerations into national development projects.

Relevance to the Revenue Collection Offices Project

The NTP is directly relevant to the Revenue Collection Offices project. Because the Plan includes "Environment and Climate Resilience" as one of its four pillars, the design and construction of the revenue offices should explicitly incorporate climate-proofing, mitigation of disaster risks (e.g., flooding, extreme weather), and resilient infrastructure elements.

The principles of transparency, accountability and public participation built into the NTP underscore the need for the ESIA process to engage stakeholders, report openly on environmental and social performance, and ensure that affected communities in Baidoa, Kismayo, Jowhar, and Dhuusamareb are consulted and their concerns addressed.

Finally, the NTP's emphasis on sustainable economic transformation and improved infrastructure aligns with the project's purpose: developing permanent, state-owned revenue offices (rather than rented ones), improving service delivery and ensuring infrastructure is built to long-term standards.

3.2. State Level Environmental and Social Regulations and Guidelines

At the Federal Member State (FMS) level, each state has established a Ministry of Environment and Climate Change (or its equivalent) to oversee natural resource management, environmental protection, and climate change adaptation. However, apart from Puntland, most states still lack comprehensive environmental legislation or dedicated ESIA regulations. Where frameworks exist, they remain nascent, fragmented and weakly enforced, limiting their effectiveness. Consequently, the FMS continue to rely heavily on the federal Environmental Protection and Management Act (2024), the ESIA Regulations (2024), and donor-supported safeguard frameworks as the primary basis for environmental and social risk management. In practice, state ministries mainly provide administrative support, permit facilitation, and community-level coordination, while technical oversight and binding legal compliance are anchored at the federal level.

3.2.1. Puntland Environment Policy

Article 96 of the Constitution of Puntland recognizes the significance and safeguarding of the environment, addressing issues such as pollution, deforestation, and soil erosion are integral components. Trading in charcoal and endangered plant and animal species is prohibited by the Constitution. Additionally, the development of unsustainable urban sprawls in rural areas is also prohibited. The following are issues related to the environmental protection and management in Puntland:

- Environmental Policy (2014) approved by the Cabinet and Parliament
- Environmental Management Act (2016) approved by the Cabinet
- Puntland Rangeland Management Policy, 2nd Edition (2016-2025)
- Puntland Waste Management Policy (2016)
- EIA Act and Regulation (2016) approved by Cabinet and Parliament
- Puntland Climate Change Strategy (2016)
- Ministry of Environment and Climate Change Strategic Plan (2016-2020)
- Puntland Sexual Offences Act 2016

3.3. International Conventions Signed and Ratified by Somalia

Somalia is a signatory to several international conventions, treaties and agreements that establish global standards for environmental protection, biodiversity conservation and climate resilience. These instruments not only strengthen national legislation but also provide an international framework to ensure that development initiatives, such as the proposed Revenue Collection Offices project, are implemented in line with globally recognized sustainability principles.

1. *Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES)* – Regulates international trade in endangered species to ensure their survival.
2. *Convention on the Conservation of Migratory Species of Wild Animals (CMS)* – Promotes conservation of terrestrial, marine, and avian migratory species across their range.
3. *Regional Convention for the Conservation of the Red Sea and the Gulf of Aden Environment* – Protects marine and coastal ecosystems of the Red Sea and Gulf of Aden.
4. *Montreal Protocol on Substances that Deplete the Ozone Layer* – Controls production and consumption of ozone-depleting substances.
5. *United Nations Convention to Combat Desertification (UNCCD)* – Focuses on land degradation prevention and sustainable land management.
6. *United Nations Framework Convention on Climate Change (UNFCCC)* – Provides the framework for global climate change mitigation and adaptation.
7. *Kyoto Protocol to the UNFCCC* – Establishes legally binding commitments for developed countries to reduce greenhouse gas emissions.
8. *Convention on Biological Diversity (CBD)* – Promotes biodiversity conservation, sustainable use, and equitable sharing of benefits.
9. *Cartagena Protocol on Biosafety to the CBD* – Regulates safe handling, transport, and use of living modified organisms (LMOs).
10. *Basel Convention* – Regulates the transboundary movement and disposal of hazardous wastes.
11. *Stockholm Convention* – Controls the production and use of persistent organic pollutants (POPs).
12. *Rotterdam Convention* – Promotes shared responsibilities in the importation of hazardous chemicals.
13. *Protocol Concerning Regional Cooperation in Combating Pollution by Oil and Other Harmful Substances in Cases of Emergency* – Enhances preparedness and response to marine pollution emergencies.
14. *United Nations Convention on the Law of the Sea (UNCLOS)* – Governs all aspects of ocean space, including marine resources and environmental protection.
15. *Nairobi Convention (Convention for the Protection, Management and Development of the Marine and Coastal Environment of the Eastern African Region)* – Encourages regional cooperation for the sustainable management of the marine and coastal environment.
16. *International Labour Organisation (ILO) Conventions* – Somalia has ratified key conventions that safeguard workers' rights, promote decent working conditions and prohibit forced or child labour. These apply directly to the recruitment, safety and welfare of workers during the construction and operation phases.

17. *African Union Convention on the Conservation of Nature and Natural Resources*– This regional convention encourages member states to adopt policies and strategies that ensure the sustainable use of natural resources and environmental protection during development.

18. *Convention on Biological Diversity (CBD)* – The CBD promotes the conservation of biodiversity and the sustainable use of natural resources. This is relevant where the project might impact ecosystems, land use, or biodiversity during construction activities.

3.4. The African Development Bank's Environmental and Social Standards (AfDB)

The Federal Government of Somalia, through the Ministry of Finance, recognizes the vital role of integrating environmental and social safeguards into the planning and execution of development initiatives. As the proposed revenue collection offices are to be funded by the African Development Bank (AfDB), the project will be designed and implemented in full compliance with the Bank's environmental and social sustainability standards.

The AfDB adopts a holistic approach to development, ensuring that environmental and social considerations are embedded throughout the entire project cycle. This commitment is operationalized through the Integrated Safeguards System (ISS), a framework that guides the identification, avoidance, and mitigation of potential adverse impacts, while enhancing the long-term benefits of development investments.

At the core of the ISS are the Operational Safeguards (OSs)—a set of policy standards that define the conditions under which AfDB-financed projects must be carried out to ensure environmental soundness and social inclusivity. These safeguards are supported by the Environmental and Social Assessment Procedures (ESAPs) and a series of technical guidelines, which provide governments and project implementers, including the Ministry of Finance, with practical steps to achieve compliance.

In addition, the ISS offers Sector Guidelines and Technical Directives, which serve as methodological tools and best-practice references for addressing critical issues such as biodiversity protection, pollution prevention, labour standards, occupational health and safety, involuntary resettlement, and community engagement. These instruments ensure that projects not only meet international standards but also deliver real and lasting benefits to local populations, particularly vulnerable groups.

By committing to the AfDB's ISS, the Ministry of Finance affirms that the proposed project will proactively manage environmental and social risks, while contributing to Somalia's broader goals of sustainable development, resilience building, and inclusive economic growth.

The ISS is anchored in five Operational Safeguards, each outlining specific requirements for addressing environmental and social risks. These safeguards form the cornerstone of the Bank's sustainability agenda and provide a structured pathway for ensuring that all AfDB-financed projects are implemented responsibly and equitably

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3.5. Applicable AfDB Operational Safeguards (OS)

Operational Safeguard (OS)	Description	Trigger for the Project	Relevance to Revenue Collection Offices Project
OS 1: Environmental and Social Assessment	Requires integrated assessment of environmental and social risks and impacts throughout the project cycle.	Triggered because the project involves construction, demolition, material use, waste generation, and community interactions.	Ensure risks such as dust, noise, waste, and health & safety issues are identified, mitigated, and managed, while enhancing positive outcomes like employment creation and improved revenue services.
OS 2: Involuntary Resettlement: Land Acquisition, Population Displacement, and Compensation	Ensures fair and transparent compensation, livelihood restoration, and avoidance of involuntary displacement.	Not triggered	The sites are located on government-owned land, not occupied, and no displacement or relocation of people or assets is required.
OS 3: Biodiversity and Ecosystem Services	Protects biodiversity, ecosystems, and natural habitats from negative project impacts.	Triggered because site clearance, landscaping, and construction activities directly affect urban green spaces and ecosystem services.	Ensure project activities do not degrade local biodiversity or disrupt ecosystem services, and incorporates landscaping and green design to enhance urban ecology.
OS 4: Pollution Prevention and Control, Greenhouse Gases, Hazardous Materials, and Resource Efficiency	Promotes pollution prevention, waste minimization, climate-friendly practices, and efficient resource use.	Triggered because construction generates solid waste, dust, noise, GHG emissions from machinery, and requires significant energy and water inputs.	Ensures adoption of efficient construction practices, proper waste management, safe handling of hazardous materials, and measures to minimize emissions and resource consumption.
OS 5: Labour Conditions, Health and Safety	Protects labour rights, promotes fair working conditions, and ensures occupational health and safety (OHS).	Triggered because over 100 workers will be engaged, requiring OHS protocols, PPE, health facilities, and compliance with labour laws.	Ensures all workers operate under safe and fair conditions, prevents child or forced labour, and establishes health and safety measures for both construction and operational phases.

Table 4- 1: Applicable AfDB Operational Safeguards (OS)

Under the African Development Bank's (AfDB) Integrated Safeguards System (ISS), every project is required to undergo an environmental and social review that reflects the scale and nature of its potential risks and impacts (AfDB, 2015). The Bank applies its Environmental and Social Assessment Procedures (ESAPs) to screen projects, which are then assigned to one of four categories: 1, 2, 3, or 4 depending on their risk profile.

For this project, the outcome of the screening has placed it in Category 2. This classification indicates that while the project is likely to generate some notable environmental and social impacts, these impacts are expected to be localized, manageable and less severe than those of Category 1 projects. In response, a full Environmental and Social Impact Assessment (ESIA) must be undertaken, accompanied by a detailed Environmental and Social Management Plan (ESMP).

The ESIA provides a structured process for identifying, predicting and analysing the project's potential impacts. Its results form the basis of the ESMP, which lays out concrete measures for mitigation, monitoring and institutional responsibilities across all phases of the project. Consistent with ISS requirements, the process also demands robust stakeholder engagement and open consultations, ensuring inclusivity, transparency and accountability. Furthermore, a simplified version of the ESMP must be disclosed publicly to improve access to information and encourage meaningful community participation in the project's implementation.

3.6. Institutional Framework for Environmental and Social Management in Somalia

Environmental and social management in Somalia is shaped not only by institutional mandates but also by the fiscal realities of revenue collection across the Federal Member States (FMS). States with stronger and more predictable revenue bases are better positioned to implement and enforce environmental regulations, while those with weaker revenue systems remain heavily dependent on federal frameworks and donor-supported safeguards. This fiscal dimension directly affects the capacity of state-level institutions to contribute meaningfully to projects such as the demolition and reconstruction of the Ministry of Finance

3.6.1. Institutional Framework

Institution	Mandate / Description	Relevance to the MoF Project (Revenue Dimension)
Office of the Prime Minister (OPM)	Coordinates federal ministries and agencies, ensuring national alignment. Provides policy oversight through inter-ministerial committees.	Ensures coherence between fiscal management at federal and state levels, enabling coordinated funding and oversight of environmental safeguards.
Ministry of Environment and Climate Change (MoECC)	Federal body responsible for environmental policy, compliance, and climate resilience.	Provides the legal backbone for ESIA implementation across Somalia. Since state ministries rely on federal transfers and donor funds for enforcement, MoECC ensures uniform application of safeguards regardless of state revenue disparities.
Federal Member State (FMS) Ministries of Environment and	Each state has a ministry responsible for environmental governance. Puntland has relatively stronger frameworks	Their effectiveness is linked to fiscal capacity: states with stronger customs and tax systems (e.g., Puntland and Jubbaland) can allocate more resources

Institution	Mandate / Description	Relevance to the MoF Project (Revenue Dimension)
Climate Change	due to higher local revenue collection capacity; other states still have nascent systems.	to enforcement. Others rely heavily on federal transfers and donor funding, limiting their oversight role to administrative facilitation and community engagement.
Ministry of Labour and Social Affairs (MoLSA)	Regulates labour and workplace conditions.	Supports labour standards at the project site. Limited revenue collection at state level constrains labour inspectorates, making federal oversight more critical.
Department of Occupational Safety and Health (DOSH)	Enforces occupational safety in workplaces under the Labour Code.	While federal inspectors have primary jurisdiction, revenue constraints in most states limit state-level monitoring capacity. Puntland, with stronger fiscal autonomy, maintains relatively more active labour inspections.
Ministry of Energy and Water Resources (MoEWR)	Oversees water and energy resources nationally.	Provides technical input on sustainability. Implementation at state level is uneven, reflecting revenue constraints that weaken local regulatory reach.
Ministry of Gender, Labour and Social Development (MoGLSD)	Promotes gender equality, social protection, and safe working conditions.	Relies largely on federal and donor resources to enforce policies, as state ministries often lack adequate budgets due to weak domestic revenue mobilization.
Somali Police Force	Ensures law and order, including at project sites.	Security operations are directly tied to revenue collection: in better-financed states, policing is more effective. Elsewhere, security support relies heavily on federal budget allocations.
Federal Member States Municipal Administrations	Oversee local governance, urban services, sanitation, and municipal-level enforcement. Collect revenue through local taxes, levies, and service fees.	Municipal administrations play a critical role in project-level waste management, permits, and local compliance. States with stronger municipal revenue systems (e.g., Puntland, Jubbaland) can actively support oversight, while weaker municipalities rely heavily on federal transfers or donor funding.
Ministry of Public Works – Federal Government	Leads national public works planning, infrastructure standards, and coordination with donors.	Provides technical standards and overall coordination. Relies on federal budget allocations and external financing, given limited domestic revenue mobilization.
Ministry of Public	Responsible for state-level	Their capacity is tied to each state's

Institution	Mandate / Description	Relevance to the MoF Project (Revenue Dimension)
Works – Federal Member States	public works, infrastructure, and local construction oversight.	fiscal base: stronger revenue collection enables more active oversight of building codes and project approvals; weaker states depend on federal guidance and donor support.
Ministry of Finance (MoF)	National lead on fiscal management, donor coordination, and procurement.	Directs project financing and ensures AfDB safeguards are embedded. Revenue-sharing with FMS affects the extent to which state ministries can fulfill their oversight role in practice.

Table 4- 2: Insitutional Framework

3.7. Key Institutions to the ESIA Process

Level	Institution	Roles and Responsibilities (Specific to the Project)
National	**Ministry of Environment and Climate Change (MoECC)**	• Lead oversight on environmental compliance during demolition and construction activities. • Approve the Environmental and Social Impact Assessment (ESIA) and Environmental and Social Management Plan (ESMP). • Ensure adherence to national environmental policies, standards, and international conventions. • Monitor and enforce mitigation measures to prevent pollution, protect air and water quality, manage waste, and control noise levels. • Conduct inspections and audits to prevent environmental degradation throughout the project lifecycle.
National	**Ministry of Labour and Social Affairs (MoLSA)**	• Ensure worker health and safety measures are implemented at all demolition and construction sites. • Enforce labour regulations, including use of Personal Protective Equipment (PPE), safe work practices, and prevention of child or forced labour. • Monitor occupational safety compliance and investigate any workplace incidents.
National	**Ministry of Public Works (Federal Government)**	• Provide technical oversight and regulatory approval for building design, structural safety and urban planning standards. • Issue permits for demolition and reconstruction works in line with federal building codes. • Ensure integration of disaster risk reduction and climate

Level	Institution	Roles and Responsibilities (Specific to the Project)
		resilience into infrastructure development.
Sub-National	**Federal Member State Ministries of Environment and Climate Change**	• Enforce state-level environmental policies, regulations, and standards during demolition and construction. • Oversee noise control, air quality, debris disposal, and hazardous waste handling in coordination with contractors. • Support community engagement and grievance redress mechanisms within the project area.
Sub-National	**Federal Member State Ministries of Public Works**	• Supervise compliance with state-level construction regulations, including building codes and urban planning by-laws. • Issue state-level permits for site clearance, construction, and waste management. • Work with contractors to ensure structural integrity and safe engineering practices at the project site.
Sub-National	**Federal Member State Health and Safety Units**	• Monitor public health and safety risks in and around the construction area. • Coordinate emergency preparedness and response in the event of accidents or hazardous material exposure. • Ensure that temporary health hazards (e.g., dust, noise, debris) are managed in accordance with public health regulations.

Table 4- 3: Key Institutions to the ESIA Process

3.8. Capacity Assessment of Somalia's Public Entities in Charge of Environmental and Social Assessment (ESA) Enforcement and Oversight

The effective implementation of environmental and social safeguards for the construction of revenue offices across the Federal Member States (FMS) relies on a network of federal and state-level institutions. While institutional mandates exist, technical and enforcement capacities remain uneven. This section assesses mandates, technical capacities, coordination mechanisms and provides targeted recommendations in view of the ESIA requirements for the project.

3.8.1. Ministry of Environment and Climate Change (MoECC) – Federal

Institutional Mandate:

Lead regulator for environmental governance at the national level, including policy formulation, approval of ESIAs, and oversight of environmental and social management plans. Responsible for setting standards and coordinating with FMS environment ministries to ensure compliance during construction.

Technical Capacity:

Staff have policy and regulatory expertise, but practical skills for supervising construction-related ESIA issues such as dust control, debris management, and occupational safety remain weak.

Coordination Mechanisms:

Works with FMS ministries but collaboration is irregular. Gaps remain in harmonizing environmental safeguards across states.

Recommendations:

Build in-house expertise on construction ESIA, strengthen inspection protocols, and establish a standing coordination platform with FMS ministries for project monitoring.

3.8.2. Federal Member State (FMS) Ministries of Environment and Climate Change

Institutional Mandate:

Responsible for enforcing environmental safeguards at state level, including monitoring construction activities, waste management, and community engagement in grievance redress.

Technical Capacity:

Limited staff and weak technical expertise. Most state officers lack advanced tools for site inspections and rely on guidance from the federal MoECC or donor projects.

Coordination Mechanisms:

Collaboration with MoECC exists but is often informal. Municipal authorities sometimes fill enforcement gaps where state resources are limited.

Recommendations:

Strengthen technical training for officers on construction-related ESIA monitoring, provide practical tools such as air quality meters and PPE, and formalize coordination between state and federal oversight functions.

3.8.3. Ministry of Labour and Social Affairs (MoLSA) – Federal (including DOSH)

Institutional Mandate:

Enforces labour standards and occupational health and safety (OHS) during construction through the Department of Occupational Safety and Health (DOSH).

Technical Capacity:

Labour inspectors are few and under-resourced, with limited ability to monitor multiple construction sites. OHS codes are outdated and rarely applied in practice.

Coordination Mechanisms:

Weak collaboration between DOSH, contractors, and FMS authorities results in fragmented enforcement of OHS requirements.

Recommendations:

Update occupational safety guidelines for construction, expand inspector training, and integrate OHS compliance into ESIA monitoring frameworks for the project.

3.8.4. Federal Member State (FMS) Ministries of Public Works

Institutional Mandate:

Regulate construction standards, issue building permits, and monitor site-level compliance with building codes.

Technical Capacity:

Some states maintain engineering units capable of reviewing designs and inspecting construction sites, but capacity is uneven and often stretched.

Coordination Mechanisms:

Informal coordination with federal Ministry of Public Works and MoECC, often resulting in overlap and unclear mandates.

Recommendations:

Harmonize building standards nationally, enhance state-level inspection capacity, and integrate ESIA monitoring into the building permit process for revenue offices.

3.8.5. Ministry of Finance (MoF) – Federal

Institutional Mandate:

Project proponent, responsible for project budgeting, procurement, and contractor management.

Technical Capacity:

Does not have an in-house safeguards unit. Relies on consultants for ESIA preparation and monitoring.

Coordination Mechanisms:

Engagement with environmental and social regulators is often limited to early project stages, with weak follow-through during implementation.

Recommendations:

Establish an Environmental and Social Safeguards Unit within MoF to track ESMP compliance and make adherence to safeguards a condition for contractor payments.

3.8.6. Somali Police and Security Forces

Institutional Mandate:

Provide site security, maintain public order around construction sites, and respond to emergencies.

Technical Capacity:

Officers have no training in environmental health, hazardous waste handling, or ESIA-related safety protocols.

Coordination Mechanisms:

Engagement with environmental and OHS regulators is reactive, usually following accidents or complaints.

Recommendations:

Provide site-level training on environmental risks, occupational safety basics, and integrate police participation into contractor safety briefings.

4. BASELINE ENVIRONMENTAL AND SOCIAL CONDITIONS

This section outlines the current environmental and socio-economic characteristics of the area surrounding the proposed sites for the construction of revenue offices. Establishing this baseline is critical for predicting potential project impacts and informing the design of effective mitigation measures. The assessment covers the physical environment, biological resources, and socio-economic setting, while also identifying sensitive receptors that may be affected. It further delineates the project's area of influence and notes existing trends or conditions that could evolve prior to project implementation. By providing a clear picture of the local context, the baseline ensures that the Environmental and Social Impact Assessment (ESIA) is rooted in accurate, site-specific information.

4.1. Dimensions and Boundaries of the Study Area and Surrounding Areas Likely to be Environmentally Affected

4.1.1. Baidoa – (South West State)

The proposed site in Baidoa covers 42.25m x 29.9m (1,264 sq.m) within a government-owned parcel of land. The plot is currently vacant and unbuilt, with compacted bare soil and minimal vegetation.

The 500-meter zone of influence comprises a mix of government institutions, business premises and community residences, creating a socially sensitive environment. Construction of the new revenue office will generate noise, dust and traffic disruption, affecting both service delivery in adjacent offices and daily community activities.

Beyond 500 meters, construction traffic along Baidoa's busy roads may cause congestion, safety risks, and dust, particularly during material haulage and waste disposal.

4.1.2. Jowhar – (Hirshabelle State)

The Jowhar project site measures approximately 28 x 21.2m (594 sq.m) of undeveloped land within the central government precinct. The site is bare and unoccupied, reserved for public infrastructure development.

The 500-meter immediate zone is dominated by government institutions, reflecting Jowhar's status as an administrative hub. Impacts will therefore largely affect public offices and service users through dust, noise, and restricted access during construction.

Extended impacts may occur along access roads used for transporting materials and machinery, where flooding and poor drainage could intensify construction-related disruptions.

4.1.3. Dhuusamareb – (Galmudug State)

The Dhuusamareb site is significantly larger than the others, covering 72m x 60m (4,320 sq.m). The plot is currently vacant, with mostly bare ground and some scattered vegetation.

The 500-meter surrounding zone is dominated by government institutions, with business establishments located at greater distances. As a result, disturbances will be felt most strongly in government service delivery areas, while business activities may experience only minimal indirect effects.

The extended zone of influence includes feeder roads connecting Dhuusamareb to nearby settlements, which may be impacted by increased traffic, dust, and potential surface wear from construction haulage.

4.1.4. Kismayo – (Jubbaland State)

The proposed site in Kismayo measures 21.85m x 24.6m (538 sq.m). The land is vacant and enclosed within the city's urban center, with no existing structures.

The 500-meter immediate surroundings include a mix of government offices, private businesses, and a few residential areas. The diverse land use makes the site particularly sensitive to construction-related disruptions, including noise, dust, restricted access, and temporary business interruptions.

Extended impacts are expected along major access roads linking the site to Kismayo port and supply depots, which already experience high truck traffic. Construction-related movements may aggravate congestion, road safety risks, and localised air pollution.

4.2. Physical Environment

4.2.1. Physical Location

4.2.1.1. South West State

The proposed Revenue Collection Office project is located in Baidoa, the administrative capital of South West State in south-central Somalia. The site is situated in the Dabashinka area, within the city's government precinct and occupies a strategic roadside position directly opposite Hotel Eedin.

The exact geographic coordinates are 3° 6.995′ N, 43° 38.768′ E. The site is surrounded by a mix of government institutions, business establishments, residential quarters, and community services, reflecting Baidoa's semi-urban setting. Notably, the Ministry of Internal Security is located approximately 50 meters from the site, underscoring the security and administrative importance of the location.

Image 5-1: Baidoa Project Location

4.2.1.2. Jowhar-Hirshabelle state

The proposed Revenue Collection Office project is in Jowhar, the administrative capital of Hirshabelle State, situated north of Mogadishu along the fertile Shabelle River basin. The project site lies at coordinates 2° 46′ 17″ N, 45° 29′ 46″ E, within the city centre government compound that hosts the Ministry of Finance, Ministry of Commerce, and Ministry of Planning. This strategic clustering of state institutions underscores Jowhar's role as a key administrative hub for Hirshabelle State.

The surrounding setting within a 500-meter radius is predominantly occupied by government offices, with only limited commercial establishments and residential quarters. This makes the area particularly suitable for hosting a state-level revenue office, as it ensures proximity to relevant ministries and facilitates inter-agency coordination.

Jowhar is linked to Mogadishu through the Jowhar–Balcad–Mogadishu Road, although seasonal flooding often affects road conditions and may temporarily constrain construction access. Despite these challenges, the site's central administrative location enhances its importance and suitability for the proposed development, offering secure and direct access for both government stakeholders and the public.

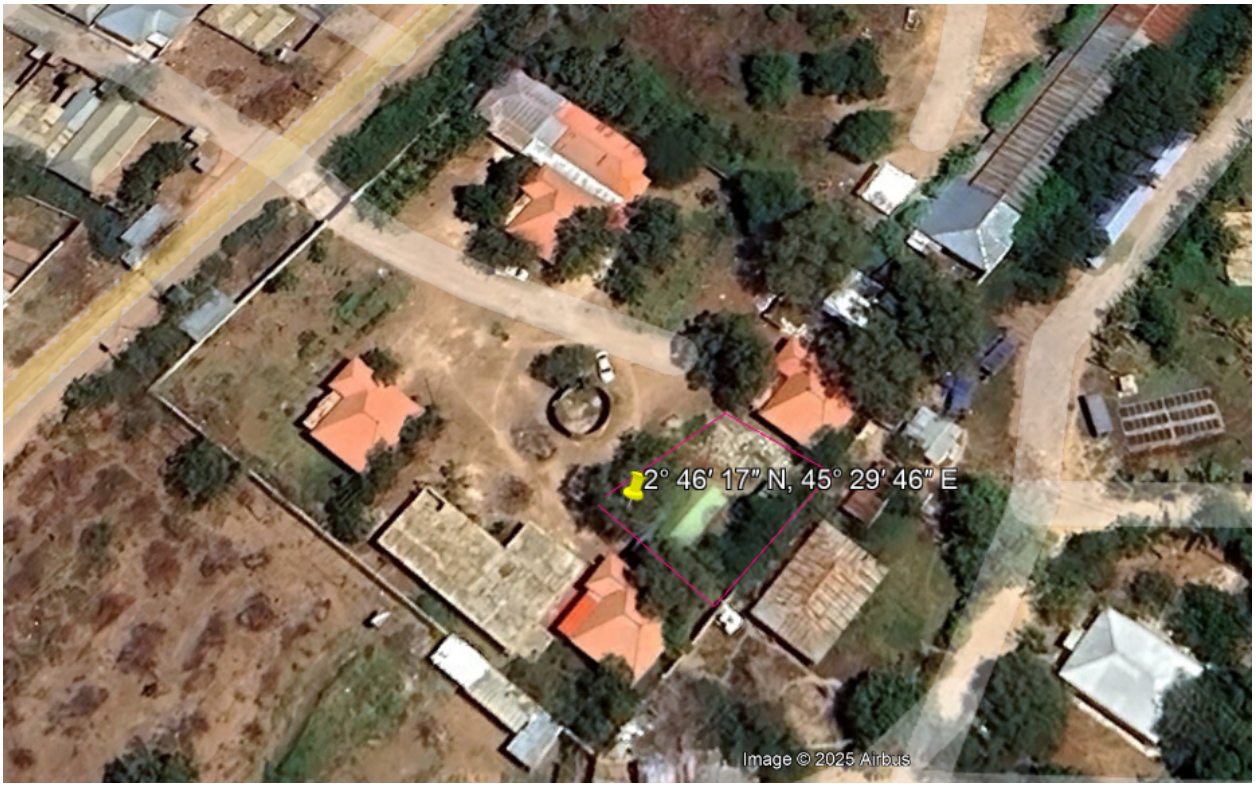


Image 5-2: Johwar Project Location

4.2.1.3. Kismayo-Jubbaland State

The proposed Revenue Collection Office project is in Kismayo, the administrative capital of Jubbaland State, situated along the southern Somali coastline of the Indian Ocean. The project site is in the Fanoole area, positioned at coordinates 0° 21′ 43.56″ S, 42° 32′ 52.5″ E. It lies within the Ministry of Finance compound, directly adjacent to the Ministry of Trade on the eastern side, and opposite Agan Hotel to the west. The site is served by a well-connected internal road network, ensuring easy accessibility.

The surrounding urban core features a blend of government offices, private businesses, and residential areas, reflecting Kismayo's dual role as both an administrative and commercial hub. The site benefits from strong transport connectivity: the Kismayo–Afmadow road and the seaport serve as vital corridors for trade and logistics, while Kismayo International Airport, located approximately 10 km away, provides reliable access for staff, goods, and construction materials.

Image 5-3: Kismayo Project Location

4.2.1.4. Dhuusamareb-Galmudug state

The proposed Revenue Collection Office project is in Dhuusamareb, the administrative capital of Galmudug State in central Somalia. The site lies at coordinates 5° 31′ 55″ N, 46° 22′ 55″ E, situated on the outskirts of the town within a designated government ministries area. The compound hosts the Ministry of Finance and the Ministry of Humanitarian and Disaster Management, placing the project near key state institutions. The site is strategically positioned along the Airport Road, ensuring direct connectivity for transport and logistics.

The project area is relatively spacious, providing ample room for construction activities. The surrounding environment is primarily composed of government facilities, with business establishments and residential quarters located further away.

Image 5-4: Dhuusamareb Project Location

4.2.2. Topography

4.2.2.1. Baidoa – South West State

Baidoa is located on a gently undulating plateau in South West Somalia, with the site's elevation of around 500 meters above sea level. The town sits on relatively flat terrain, though low ridges and shallow depressions are common in the surrounding landscape. The project site itself is on stable, level ground suitable for construction, with no significant slopes or erosion-prone features. Seasonal surface runoff during rains flows towards shallow depressions but does not pose major drainage risks within the site.

4.2.2.2. Jowhar – Hirshabelle State

Jowhar lies within the Shabelle River floodplain, characterised by flat, low-lying topography at approximately 100 meters above sea level. The terrain is predominantly level, with fertile alluvial soils deposited by the river. However, the low elevation makes the area prone to seasonal flooding and waterlogging, particularly during heavy rains or river overflow. The project site itself is flat and accessible, though construction planning will need to consider stormwater management and flood resilience.

4.2.2.3. Kismayo – Jubbaland State

Kismayo sits along the southern Somali coastal plain, with an average elevation of 12–20 meters above sea level. The project site is situated on flat terrain, typical of coastal topography. The surrounding area is generally low-lying, with minimal relief and is influenced by proximity to the Indian Ocean. While the site does not lie in a high-risk flood zone, seasonal rains can cause temporary surface water accumulation due to poor drainage in some urban sections.

4.2.2.4. Dhuusamareb – Galmudug State

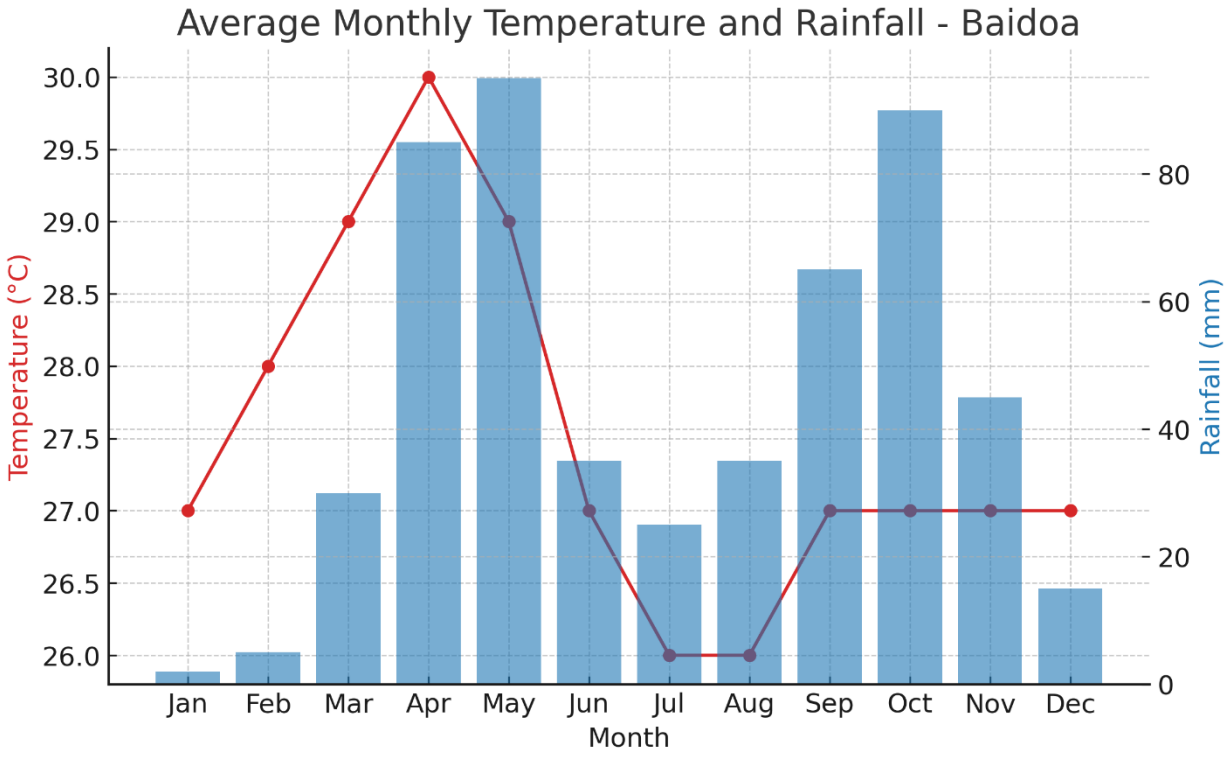
Dhuusamareb is in central Somalia's arid plateau region, at an elevation of about 600–650 meters above sea level. The town is surrounded by flat to gently sloping terrain, interspersed with occasional rocky outcrops and shallow seasonal drainage channels (toggas). The project site itself lies on level ground, well-suited for construction. Due to the semi-arid conditions, the area experiences limited runoff, with rainfall events often resulting in localised pooling rather than widespread erosion.

4.2.3. Climate and Meteorology

The climate of Somalia is generally characterized as arid to semi-arid, with strong seasonal variability governed by two main rainy seasons — the Gu (March to June) and the Deyr (October to December) — and two intervening dry seasons, the Hagaa (July to September) and the Jilaal (January to February). Rainfall is typically low, irregular, and highly variable in space and time, while temperatures remain consistently high throughout the year. The project sites — Baidoa (South West State), Jowhar (Hirshabelle State), Kismayo (Jubbaland State), and Dhuusamareb (Galmudug State) — fall within different climatic zones, each exhibiting unique meteorological patterns, risks, and implications for development.

4.2.3.1. Baidoa (South West State)

Baidoa experiences a semi-arid tropical climate with hot conditions year-round and an average annual temperature of around 26–27°C. The Gu rains (March–June) form the primary wet season, supporting crop production and livestock grazing. However, rainfall is often erratic and can trigger flash flooding in low-lying areas during heavy downpours. The Deyr rains (October–December) are shorter and lighter but remain vital for replenishing water sources and sustaining pastures. Baidoa is highly vulnerable to droughts, especially when both Gu and Deyr seasons fail, a frequent occurrence in recent decades. The seasonal winds are variable, with drier, dusty conditions dominating during the Jilaal dry season.

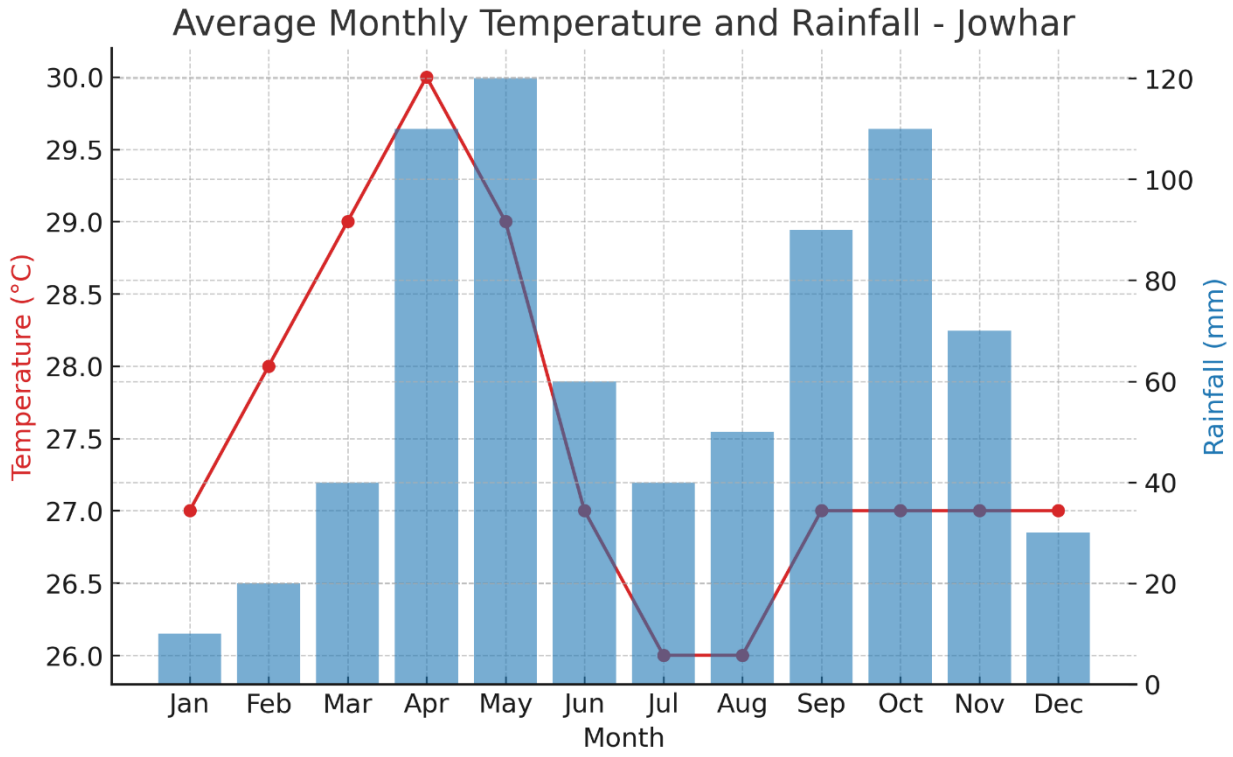


Source: Weatherspark (2025), Climate-Data.org (2025)

Figure 5-1: Baidoa Rainfall and Temperatures (Monthly Average)

4.2.3.2. Jowhar (Hirshabelle State)

Jowhar lies within the Middle Shabelle floodplain, giving it a tropical semi-arid climate influenced heavily by the Shabelle River. Average annual temperatures are around 27°C, with limited seasonal variation. Rainfall averages 450–480 mm per year, concentrated in the *Gu* and *Deyr* seasons. Unlike inland areas, rainfall in Jowhar is strongly linked to upstream Ethiopian highland inflows, which often cause riverine flooding during Gu and Deyr, even if local rainfall is moderate. This makes Jowhar simultaneously productive for irrigated agriculture and highly vulnerable to seasonal floods. Humidity and cloudiness increase significantly during the rainy periods, while hot and dry conditions dominate in the Hagaa and Jilaal seasons.



Source: Weatherspark (2025), Climate-Data.org (2025)

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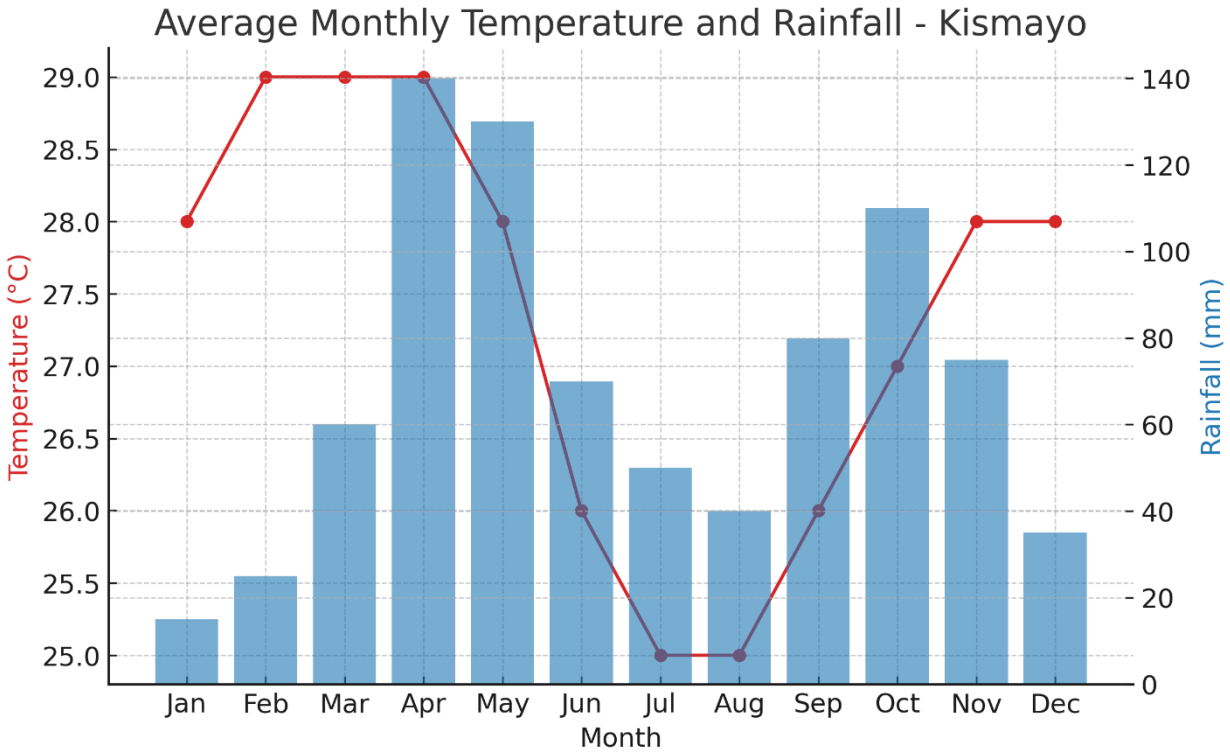
Figure 5-2: Johwar Rainfall and Temperatures (Monthly Average)

4.2.3.3. Kismayo (Jubbaland State)

Kismayo has a humid tropical coastal climate, moderated by its location along the Indian Ocean. Temperatures remain high year-round, generally in the upper 20s°C, but the maritime influence reduces diurnal extremes. The *Gu* rains (March–June) constitute the wettest period, replenishing groundwater and supporting coastal farming and fishing activities. The *Deyr* rains (October–December) also deliver substantial rainfall, at times heavier than inland regions, prolonging agricultural activity into the late year. However, Kismayo faces risks of urban flooding, coastal inundation, and erosion, particularly when heavy rains coincide with high tides. Seasonal monsoon winds influence local weather, with sea breezes moderating heat but bringing high humidity.



Source: Weatherspark (2025), Climate-Data.org (2025)

Figure 5-3: Kismayo Rainfall and Temperatures (Monthly Average)

4.2.3.4. Dhuusamareb (Galmudug State)

Dhuusamareb, located in central Somalia, experiences a hot, arid to semi-arid climate with mean annual temperatures of about 27–28°C. Rainfall is sparse, estimated at 200–250 mm annually, and is highly unreliable. The *Gu* season provides the main opportunity for water recharge and pasture growth, but rains are often below average and erratic. The *Deyr* rains are shorter and lighter, sometimes failing altogether, which heightens the risk of recurrent droughts. When rains do occur, they can be intense and localized, producing flash floods due to poor soil infiltration. Seasonal winds, particularly during the Jilaal, often carry dust and contribute to high evapotranspiration rates, further stressing water resources.

4.2.4. Drainage and Stormwater Runoff

4.2.4.1. Baidoa (South West State)

Baidoa town has an established roadside drainage system, although it is only partially effective due to limited maintenance and frequent blockages. The proposed project site is situated adjacent to a drainage channel along the roadside, which provides some level of stormwater conveyance during rainfall events. This proximity offers an advantage in reducing surface water stagnation on the site, as runoff can be directed into the existing channel. However, the efficiency of this system is highly dependent on regular desilting and clearance of solid waste, which is a recurrent challenge in Baidoa. During intense *Gu* and *Deyr* rains, the drainage network can become overwhelmed, resulting in localized flooding along roads and low-lying areas. Proper site design should therefore integrate with

the existing drainage system, ensuring that stormwater runoff is managed without contributing to overloading or blockage of the channel.

Image 5-5: View of drainage channel next to the project site

4.2.4.2. Jowhar (Hirshabelle State)

Jowhar lacks a formal drainage system, and stormwater management is largely unstructured. Rainwater typically flows along natural depressions, unpaved streets, and open spaces, leading to widespread surface runoff during rainfall events. The absence of engineered drainage increases the risk of waterlogging and localized flooding, particularly given Jowhar's position in the flood-prone Shabelle River basin. In the event of heavy *Gu* or *Deyr* rains or when upstream flooding raises river levels, stormwater has no designated outlet, worsening inundation around settlements and roads. The proposed project site is therefore at risk of standing water accumulation during rain. Integrating a site-specific drainage system such as open channels, lined ditches, and soak-away pits will be essential to prevent flooding, protect foundations, and improve resilience.

4.2.4.3. Kismayo (Jubbaland State)

Kismayo has a partially developed urban drainage network, particularly in the central and better-planned parts of the town. However, coverage is uneven, and informal settlements and peripheral areas are typically unserved. During heavy coastal rains in the *Gu* and *Deyr* seasons, runoff often exceeds the capacity of existing drains, resulting in localized flooding, particularly where drains are clogged or absent. In low-lying neighbourhoods, poor connectivity between drainage channels

exacerbates stormwater pooling. The proposed project site's exposure to stormwater flooding will depend on its exact location relative to the serviced areas of town. Even where drains exist, maintenance challenges and solid waste disposal into channels frequently reduce system efficiency. The project design should therefore incorporate on-site stormwater management, such as catch basins, reinforced roadside drains, and proper grading to channel water into the nearest functional drainage corridor.

4.2.4.4. Dhuusamareb (Galmudug State)

Dhuusamareb has no formal drainage network, and stormwater runoff management is entirely natural, relying on terrain slope and infiltration into sandy soils. The proposed project site is not served by any drainage infrastructure, making it highly susceptible to surface runoff accumulation and flash flooding during intense local storms. While annual rainfall is lower compared to southern regions, the rains that do occur are often intense and short-lived, producing high runoff volumes that exceed the natural infiltration capacity of soils. This results in erosion, gully formation, and localized ponding around built-up areas. Without proper drainage planning, the project site could face damage to foundations, access constraints during wet periods, and accelerated wear on paved surfaces. Incorporating engineered stormwater management such as lined surface drains, storm channels, and infiltration pits will be critical to mitigate these risks

4.2.5. Water Resources

4.2.5.1. Baidoa (South West State)

Baidoa town has no significant surface water resources within its vicinity. The community relies almost entirely on groundwater abstraction through boreholes. Water supply is managed and distributed by Warjinay Water Company, which controls approximately 99% of the total water supply in Baidoa. The borehole water is piped and distributed to households and businesses, making it the primary and most reliable source of domestic and commercial water in the town. Given the absence of rivers, lakes, or perennial streams, groundwater remains the only dependable resource for Baidoa's population.

4.2.5.2. Jowhar (Hirshabelle State)

Jowhar is endowed with both surface and groundwater resources. The most important surface water body is the River Shabelle, which flows through the region and serves as a lifeline for both domestic use and irrigation farming. The river provides water for crop production in the fertile floodplains, sustaining local agriculture, which is a key livelihood in the area. In addition to river water, groundwater from boreholes supplements the supply, particularly for domestic and institutional consumption. This combination of river and borehole resources makes Jowhar relatively well-served compared to other Somali towns.

4.2.5.3. Dhuusamareb (Galmudug State)

Dhuusamareb lacks surface water resources in its immediate vicinity, with no rivers or lakes available to serve the population. The town relies exclusively on groundwater abstraction through boreholes, which are managed by the Bulshu Water Company. The borehole water is piped and supplied for domestic and institutional use, forming the backbone of water access in the area. This dependence on groundwater makes the town vulnerable to over-abstraction risks, particularly during prolonged drought periods when recharge rates decline.

4.2.5.4. Kismayo (Jubbaland State)

Kismayo's water supply is derived almost entirely from groundwater abstraction through boreholes, which are managed and distributed by the Jubba Water Company. The water is piped to households, institutions, and businesses, serving as the main source of reliable supply for the town. Although Kismayo lies along the coast of the Indian Ocean, this surface water body cannot be used for domestic or agricultural purposes due to its high salinity. As a result, the population depends exclusively on borehole water for both domestic consumption and commercial needs.

4.2.6. Ambient Air Quality

4.2.6.1. Baidoa (South West State)

Baidoa also lacks continuous air quality monitoring; however, modelled datasets (IQAir, AerisWeather) provide useful insights. Reported $PM_{2.5}$ concentrations vary between 13.6 µg/m³ and 16.8 µg/m³, occasionally exceeding the WHO 24-hour guideline of 15 µg/m³. Forecast models sometimes report lower levels (~5 µg/m³), suggesting variability influenced by local conditions. Other pollutants, including PM_{10}, NO_2, SO_2, CO, and O_3, are generally within WHO guideline limits.

Overall, Baidoa's air quality is poorer than Kismayo's, with particulate matter concentrations occasionally breaching safe short-term exposure thresholds. Likely contributors include road dust, open burning of waste, vehicular emissions, and seasonal dust storms during the dry season. This creates a moderate risk of respiratory impacts, particularly for vulnerable populations. For the proposed project site, which is located adjacent to a roadside drainage channel, construction and operational activities may exacerbate dust levels. It will be important to implement strict dust suppression measures, proper waste management, and controlled traffic movement to minimize air quality deterioration.

Although Baidoa is not a recognized pollution hotspot, demolition and construction works are expected to cause temporary increases in dust and particulates that may affect workers and nearby receptors if unmanaged. While baseline air quality monitoring was not undertaken for this ESIA, the consistently low pollutant levels and lack of industrial activity indicate minimal long-term risks. Nevertheless, it is advisable to institute regular site-specific air quality checks during demolition and excavation, especially when dust-generating activities are ongoing.

Ambient Concentrations of Common Air Pollutants and WHO Thresholds (2025)

Pollutant	Description	Real-time Level (2025)	Unit	WHO 24-h Guideline	Status vs WHO Limits
$PM_{2.5}$ (Fine Particulate Matter)	Penetrates deep into lungs	~8.2 µg/m³	µg/m³	15 µg/m³	Below limit
PM_{10} (Coarse Particulate Matter)	Irritates upper respiratory tract	~14.1 µg/m³	µg/m³	45 µg/m³	Below limit
TSPM (Total Suspended Particulates)	$PM_{2.5}$ + PM_{10} + larger particulates	~55 µg/m³ (est.)	µg/m³	~100 µg/m³	Acceptable
NO_2 (Nitrogen Dioxide)	Traffic/combustion pollutant	~0.6 µg/m³ (~0.31 ppb)	µg/m³ / ppb	25 µg/m³ (~13 ppb)	Well below limit
SO_2 (Sulphur Dioxide)	Emissions from fossil fuels	~0.5 µg/m³ (~0.14 ppb)	µg/m³ / ppb	40 µg/m³ (~15 ppb)	Well below limit
CO (Carbon Monoxide)	From incomplete fuel combustion	~120 µg/m³ (~105 ppb)	µg/m³ / ppb	10,000 µg/m³ (~9 ppm)	Well below limit
O_3 (Ozone)	Reactive gas, formed photochemically	~70 µg/m³ (~34 ppb)	µg/m³	100 µg/m³ (8-h mean)	Below limit

Table 5- 1: Baidoa Ambient Concentrations of Common Air Pollutants and WHO Thresholds (2025)

Simulated seven-day trend

$PM_{2.5}$ stays low (~6–11 µg/m³ range), PM_{10} ~10–16 µg/m³; O_3 is higher (~58–80 µg/m³) but below the 8-hr WHO guideline. Shows small daily variability and one simulated uptick.

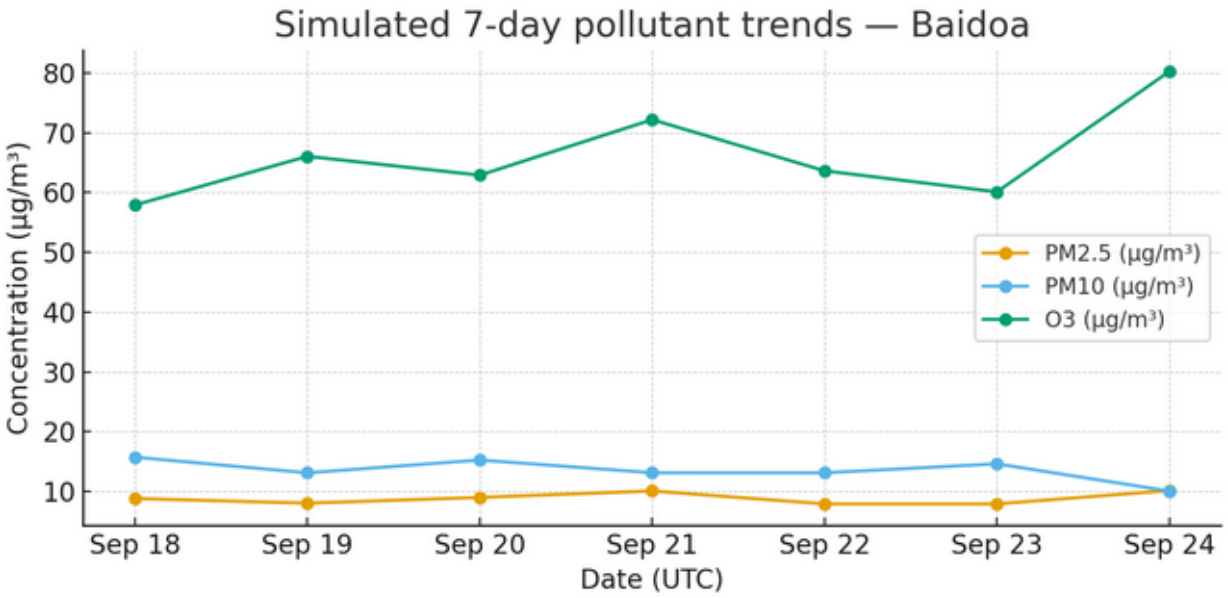


Figure 5-4: Simulated Seven-Day Trend (Baidoa)

4.2.6.2. Kismayo (Jubbaland State)

Kismayo does not have fixed air quality monitoring stations; however, modeled datasets from IQAir and AerisWeather provide indicative information. Reported $PM_{2.5}$ concentrations range between 6 µg/m³ and 10.5 µg/m³, depending on time and data source. These levels are below the WHO 24-hour guideline of 15 µg/m³, though they exceed the stricter annual guideline of 5 µg/m³. PM_{10} concentrations (~13 µg/m³) and ozone (O_3 ~25 µg/m³) are also comfortably within WHO thresholds.

Air quality in Kismayo is therefore considered moderate to good, with pollutant levels generally within acceptable limits for human health. The main contributors are likely windblown dust from unpaved surfaces, vehicle exhaust emissions, and biomass/diesel combustion. Occasional short-term increases in particulates may occur during dry and windy conditions, but overall ambient conditions remain favorable. For the project site, dust management measures during construction (e.g., water spraying, covering loose soils) and ensuring the use of low-emission machinery will help maintain air quality standards.

While the baseline air is clean, demolition and reconstruction activities could temporarily elevate levels of PM_{10} and $PM_{2.5}$, especially during earthworks and transport of construction materials. Although this ESIA did not include primary air quality measurements, the favorable background conditions and absence of heavy industry suggest that lasting impacts are unlikely. Even so, continuous ambient monitoring should be undertaken throughout the construction phase, with particular focus on periods of intense earthworks or material handling.

Ambient Concentrations of Common Air Pollutants and WHO Thresholds (2025)

Pollutant	Description	Real-time Level (2025)	Unit	WHO 24-h Guideline	Status vs WHO Limits
$PM_{2.5}$	Penetrates deep into lungs	~9.8 µg/m³	µg/m³	15 µg/m³	Below limit
PM_{10}	Irritates upper respiratory tract	~17.2 µg/m³	µg/m³	45 µg/m³	Below limit
TSPM	Total suspended particulates	~58 µg/m³ (est.)	µg/m³	~100 µg/m³	Acceptable
NO_2	Traffic/combustion pollutant	~0.9 µg/m³ (~0.45 ppb)	µg/m³ / ppb	25 µg/m³ (~13 ppb)	Well below limit
SO_2	Fossil fuel emissions	~0.6 µg/m³ (~0.15 ppb)	µg/m³ / ppb	40 µg/m³ (~15 ppb)	Well below limit
CO	Incomplete fuel combustion	~110 µg/m³ (~100 ppb)	µg/m³ / ppb	10,000 µg/m³ (~9 ppm)	Well below limit
O_3	Reactive gas	~74 µg/m³ (~37 ppb)	µg/m³	100 µg/m³ (8-h mean)	Below limit

Table 5- 2: Kismayo Ambient Concentrations of Common Air Pollutants and WHO Thresholds (2025)

Simulated 7 day pollutant trend

Moderate $PM_{2.5}$ and PM_{10}, O_3 simulated higher but within guideline; less extreme PM changes day-to-day.

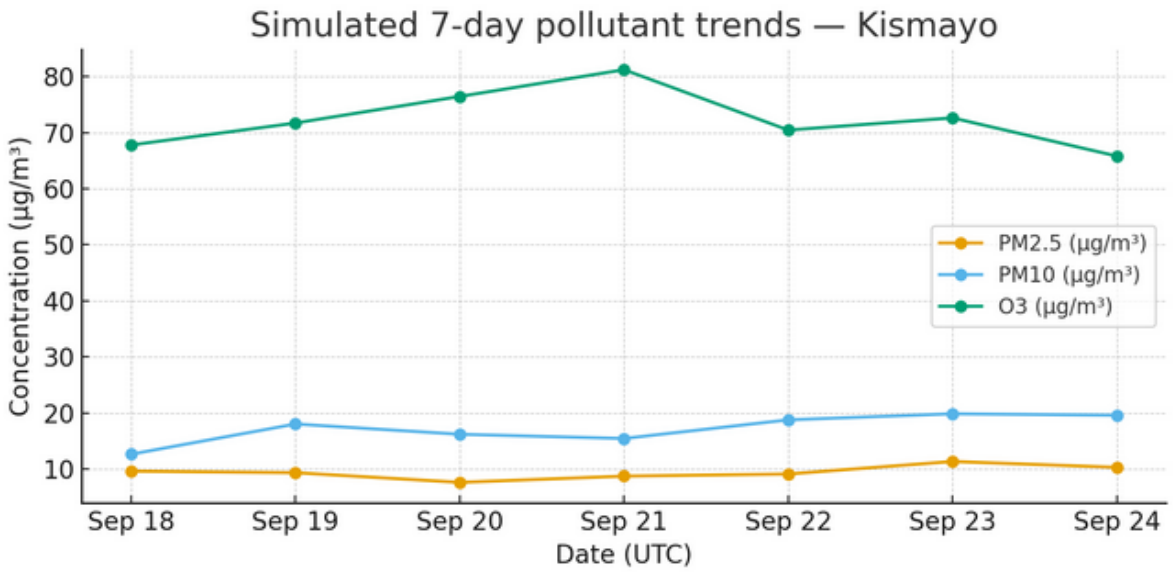


Figure 5-5: Simulated Seven-Day Pollutant Trend (Kismayo)

4.2.6.3. Johwar (Hirshabelle State)

In Jowhar, satellite-modelled datasets indicate that ambient air quality is generally moderate to good, with pollutant concentrations remaining within or close to international health guidelines. Reported $PM_{2.5}$ levels range between 12 µg/m³ and 15.3 µg/m³, values that fall just under or around the WHO 24-hour guideline of 15 µg/m³. This suggests that air quality is largely acceptable, though it occasionally approaches thresholds where sensitive individuals—such as children, the elderly, and those with respiratory conditions—may experience mild effects. Importantly, Jowhar benefits from relatively good vegetative cover compared to other urban centers in Somalia. This vegetation acts as a natural air filter by trapping dust and particulates, while also contributing to improved microclimate regulation. Other pollutants, including NO_2, SO_2, CO, and O_3, are reported at very low levels, consistent with the absence of heavy industrial activity. Overall, Jowhar's air quality is favorable, with vegetation cover playing a critical role in maintaining pollutant levels within safe limits and enhancing resilience against seasonal dust and traffic-related emissions.

Although the site is not within a known pollution hotspot, construction and demolition works will produce localized increases in dust and particulate matter that could impact sensitive receptors if unmanaged. Direct baseline monitoring was not carried out as part of this ESIA, yet the limited emission sources and generally clean background air point to low long-term risks. To safeguard receptors, it is recommended that periodic monitoring be introduced during demolition and transportation of construction materials, when particulate emissions are expected to peak.

Ambient Concentrations of Common Air Pollutants and WHO Thresholds (2025)

Pollutant	Description	Real-time Level (2025)	Unit	WHO 24-h Guideline	Status vs WHO Limits
$PM_{2.5}$	Penetrates deep into lungs	~13.2 µg/m³	µg/m³	15 µg/m³	Near limit (slightly high at times)
PM_{10}	Irritates upper respiratory tract	~19.5 µg/m³	µg/m³	45 µg/m³	Below limit
TSPM	Total suspended particulates	~65 µg/m³ (est.)	µg/m³	~100 µg/m³	Acceptable
NO_2	Traffic/combustion pollutant	~1 µg/m³ (~0.5 ppb)	µg/m³ / ppb	25 µg/m³ (~13 ppb)	Well below limit
SO_2	Fossil fuel emissions	~0.8 µg/m³ (~0.2 ppb)	µg/m³ / ppb	40 µg/m³ (~15 ppb)	Well below limit
CO	Incomplete fuel combustion	~130 µg/m³ (~115 ppb)	µg/m³ / ppb	10,000 µg/m³ (~9 ppm)	Well below limit
O_3	Reactive gas	~72 µg/m³ (~36 ppb)	µg/m³	100 µg/m³ (8-h mean)	Below limit

Table 5- 3: Johwar Ambient Concentrations of Common Air Pollutants and WHO Thresholds (2025)

Simulated Seven-Day Pollutants Trend

$PM_{2.5}$ is generally higher (near the WHO 24-hr limit in simulations), PM_{10} shows moderate variability, O_3 shows larger swings; it reflects a town with more particulate pressure and episodic peaks.

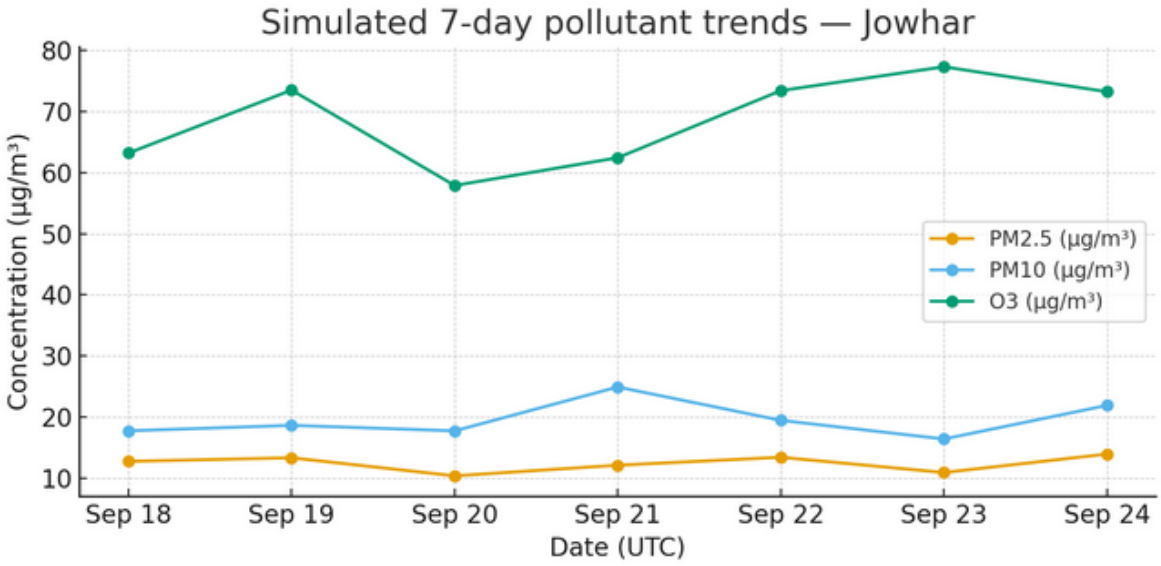


Figure 5-6: Simulated Seven-Day Pollutants Trend(Johwar)

4.2.6.4. Dhuusamareb (Galmudug State)

Dhuusamareb does not have continuous ground-based air quality monitoring stations, but modelled datasets from IQAir and Weather.com provide indicative pollutant levels. The reported values show ambient concentrations well below WHO 24-hour guideline thresholds, reflecting the absence of major industrial sources in the area.

- $PM_{2.5}$ concentrations are estimated at ~2.9 µg/m³, significantly below the WHO limit of 15 µg/m³, suggesting that fine particulate pollution is minimal under normal conditions.
- PM_{10} levels (~6.9 µg/m³) also remain comfortably within the 45 µg/m³ guideline.
- Gaseous pollutants, including NO_2 (~1 µg/m³), SO_2 (~1 µg/m³), and CO (~100 µg/m³) are reported at trace levels, far below their respective WHO thresholds (25, 40, and 10,000 µg/m³).
- Ozone (O_3), modelled at ~61.6 µg/m³, is the most significant contributor to the local air quality index but remains below the WHO 8-hour mean guideline of 100 µg/m³.

Overall, Dhuusamareb's ambient air quality is rated as "Good", with pollutants consistently within international safety limits. Short-term increases in dust and suspended particulates may occur during dry and windy conditions due to unpaved roads and natural surface exposure, but baseline air quality remains favorable for human health and the environment.

The principal sources of local air pollution include:

- Exhaust from older vehicles
- Waste burning in residential areas

- Generator emissions during power outages
- Dust from exposed soils and unpaved road networks

Though baseline conditions are favorable, planned demolition and reconstruction are expected to cause short-term rises in particulate concentrations that could affect nearby residents and workers. Although no baseline air monitoring was conducted during this assessment, the prevailing low pollution levels and lack of significant industrial contributors indicate minimal potential for chronic impacts. Nonetheless, it remains important to implement targeted monitoring during high impact works such as building demolition and soil excavation, to promptly identify and mitigate localized dust events.

Ambient Concentrations of Common Air Pollutants and WHO Thresholds (2025)

Pollutant	Description	Real-time Level (2025)	Unit	WHO 24-h Guideline	Status vs WHO Limits
$PM_{2.5}$	Penetrates deep into lungs	~2.9 µg/m³	µg/m³	15 µg/m³	Well below limit
PM_{10}	Irritates upper respiratory tract	~6.9 µg/m³	µg/m³	45 µg/m³	Well below limit
TSPM	Total suspended particulates	~40 µg/m³ (est.)	µg/m³	~100 µg/m³	Acceptable
NO_2	Traffic/combustion pollutant	~1 µg/m³ (~0.5 ppb)	µg/m³ / ppb	25 µg/m³ (~13 ppb)	Well below limit
SO_2	Fossil fuel emissions	~1 µg/m³ (~0.25 ppb)	µg/m³ / ppb	40 µg/m³ (~15 ppb)	Well below limit
CO	Incomplete fuel combustion	~100 µg/m³ (~90 ppb)	µg/m³ / ppb	10,000 µg/m³ (~9 ppm)	Well below limit
O_3	Reactive gas	~61.6 µg/m³ (~30 ppb)	µg/m³	100 µg/m³ (8-h mean)	Below limit

Table 5- 4: Dhuusamareb Ambient Concentrations of Common Air Pollutants and WHO Thresholds (2025)

Simulated Seven-Day Pollutant Trend

Lowest $PM_{2.5}$ and PM_{10} ranges in the group; O_3 moderate, occasional simulated spikes. Reflects a low-emissions, largely non-industrial setting.

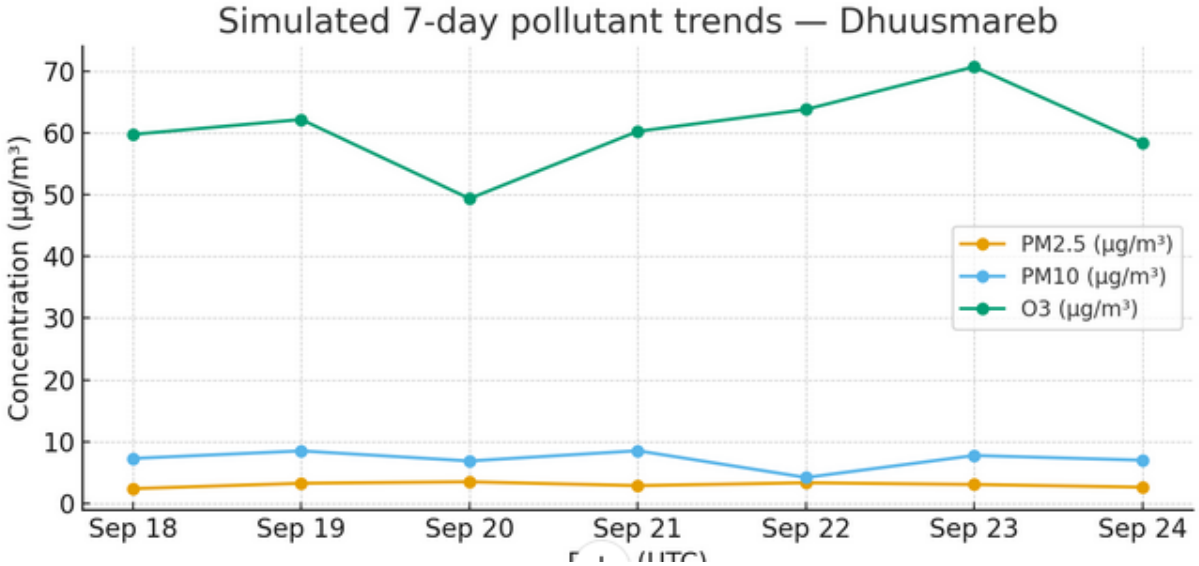


Figure 5-7: Simulated Seven-Day Pollutants Trend (Dhuusamareb)

Summary Comparison of Key Air Pollutants (2025)

The comparative analysis of ambient air quality across Baidoa, Jowhar, Kismayo, and Dhuusamareb in 2025 shows that pollutant concentrations are generally within WHO 24-hour guideline values. Fine particulate matter ($PM_{2.5}$) levels are lowest in Dhuusamareb (~2.9 µg/m³) and highest in Jowhar (~13.2 µg/m³), where readings occasionally approach the WHO threshold of 15 µg/m³. Coarse particulate matter (PM_{10}) remains well below the 45 µg/m³ guideline in all towns, while ozone (O_3) concentrations range from 61.6 µg/m³ in Dhuusamareb to 74 µg/m³ in Kismayo comfortably within the 100 µg/m³ limit. Overall, air quality is favorable across the four towns, with Jowhar requiring closer monitoring due to its relatively higher $PM_{2.5}$ levels.

Town	$PM_{2.5}$ (µg/m³)	WHO Limit (15 µg/m³)	PM_{10} (µg/m³)	WHO Limit (45 µg/m³)	O_3 (µg/m³, 8-h mean)	WHO Limit (100 µg/m³)	Status vs WHO
Baidoa	8.2	Below	14.1	Below	70.0	Below	All pollutants within limits
Jowhar	13.2	Near limit	19.5	Below	72.0	Below	Generally safe, $PM_{2.5}$ close to limit
Kismayo	9.8	Below	17.2	Below	74.0	Below	All pollutants within limits
Dhuusamareb	2.9	Well below	6.9	Well below	61.6	Below	Cleanest air quality among towns

Table 5- 5: Summary Comparison of Key Air Pollutants (2025)

4.2.7. Ambient Noise and Vibration

4.2.7.1. Kismayo (Jubbaland State)

In the current baseline condition, ambient noise levels in central Kismayo—including areas near the proposed project site—typically range between 50 and 65 dB(A) during daytime hours. The main contributors are vehicular traffic (cars, trucks, and motorcycles), market activity, port operations, and intermittent use of diesel generators. There are no large-scale industrial facilities in the vicinity, which helps keep background noise moderate and largely within tolerable limits for an urban environment.

According to the WHO (1999) Community Noise Guidelines, these levels fall within or slightly above the acceptable threshold for residential and office zones (≤55 dB[A]). Sensitive receptors such as schools, clinics, or residential areas near the main roads may already experience minor disturbance during peak hours.

During demolition and construction phases, significant short-term increases in noise and ground vibration are expected. The main noise sources will include demolition tools (85–100 dB[A]), concrete mixers and compactors (75–90 dB[A]), earth-moving machinery (80–95 dB[A]), and heavy-duty trucks (80–90 dB[A]). Without mitigation, these levels will temporarily exceed WHO guidelines, potentially causing nuisance and mild stress among nearby residents and workers.

4.2.7.2. Baidoa (South West State)

Baseline ambient noise levels in Baidoa are moderate, ranging from 50 to 60 dB(A) during daytime, particularly along main road corridors and in the central market. The key contributors are road traffic, motorcycles, informal street-level commerce, and widespread generator use, especially during electricity shortages. There are no heavy industrial activities in the town, and noise is largely limited to commercial and transport activity.

These baseline levels are within the WHO's daytime guideline for mixed residential and commercial areas but can be uncomfortable for sensitive receptors such as schools and health centers, particularly near busy roads.

Construction activities at the proposed site will introduce additional sources of noise and vibration, including jackhammers and pneumatic tools (85–100 dB[A]), bulldozers and excavators (80–95 dB[A]), and haulage trucks (80–90 dB[A]). Such levels will exceed the WHO guideline limits, resulting in temporary but noticeable noise impacts unless effective control measures are adopted.

4.2.7.3. Jowhar (Hirshabelle State)

Jowhar has relatively lower baseline noise compared to Kismayo and Baidoa, with daytime levels generally between 45 and 55 dB(A) in most parts of town. Noise mainly comes from light vehicular traffic, motorcycles, local commercial activity, and small-scale generator use. The absence of large industries and the presence of significant vegetative cover help to moderate noise propagation.

Although generally within WHO acceptable limits for residential zones, noise-sensitive receptors such as schools or clinics near main roads may experience minor disturbance during peak hours.

During demolition and construction works, elevated noise will result from equipment such as compactors and mixers (75–90 dB[A]), bulldozers and excavators (80–95 dB[A]), and trucks (80–90 dB[A]). These emissions will temporarily push ambient levels well above WHO guidelines, posing risks of nuisance and interference with community activities in the immediate vicinity of the project site.

4.2.7.4. Dhuusamareb (Galmudug State)

Dhuusamareb has the lowest baseline ambient noise of the four towns. Daytime levels generally range from 40 to 50 dB(A), reflecting its smaller size, light vehicular activity, absence of major industries, and relatively quiet residential environment. Generators and local market activity contribute to background noise, but overall levels remain within the WHO's recommended daytime limits for residential areas.

Despite the relatively quiet baseline, the commencement of construction activities will significantly alter the noise environment. Equipment such as jackhammers (85–100 dB[A]), earth-moving machinery (80–95 dB[A]), and heavy trucks (80–90 dB[A]) will substantially exceed WHO guideline limits in the project area. In this context, the relative contrast between the quiet baseline and construction noise will make impacts particularly noticeable to nearby residents and institutions.

4.2.8. Soil and Geology

4.2.8.1. Jowhar (Hirshabelle – Middle Shabelle Region)

Jowhar is located within the floodplain of the Shabelle River, an alluvial depositional environment characterized by fine-textured soils. The geology consists mainly of recent alluvium overlying older lacustrine and fluvial sediments.

Soils are deep silty clays and clay loams, with sandy loams and silty deposits occurring along natural levees. These soils are naturally fertile due to continuous silt deposition but are prone to waterlogging and flooding during the Gu rains. Drainage is often poor, particularly in depressions and low-lying sites.

Engineering-wise, these alluvial soils exhibit low bearing capacity when saturated and high compressibility, creating risks of differential settlement. Flood risk further complicates construction. Foundations for major infrastructure may require piles or elevated bases to mitigate instability and flood exposure.

4.2.8.2. Kismayo (Jubbaland – Lower Juba Region)

Kismayo lies on the coastal plain of the Indian Ocean, with geology dominated by Quaternary marine and fluvial sediments, including sand dunes, coastal deposits, and alluvial plains. Inland areas overlie sedimentary rocks of the Juba Basin.

The soils are primarily sandy to loamy sands along the coast, with pockets of clayey alluvium inland. Coastal soils are well drained but nutrient-poor, while alluvial patches are moderately fertile and support small-scale agriculture. A recurring environmental issue is salinity, driven by seawater intrusion and evaporation, which affects soil productivity and groundwater quality.

From a geotechnical standpoint, sandy soils provide moderate bearing strength if well compacted but are highly erosion-prone. Saline groundwater also presents a corrosion risk to reinforced concrete, requiring protective measures in structural design. Inland alluvium offers slightly better stability and fertility but may experience localized flooding during heavy rains.

4.2.8.3. Dhuusamareb (Galmudug – Galguduud Region)

Dhuusamareb is situated in central Somalia within a semi-arid plateau underlain by Precambrian basement rocks and weathered sedimentary formations. The geology includes extensive outcrops of sandstone, limestone, and calcareous soils, with shallow soils over bedrock in some areas.

The dominant soils are sandy loams to loamy sands, shallow in places, with coarse texture and low organic matter. These soils are well-drained but have poor water retention and low fertility, limiting

their agricultural potential without irrigation or soil amendments. In localized depressions, thin clayey layers may accumulate and hold seasonal moisture.

For construction purposes, soils overlying shallow rock have excellent bearing capacity, though excavation can be difficult. Sandy soils, however, are highly erosion-prone and subject to dust generation during dry, windy seasons. Engineering designs must therefore account for soil stabilization and dust suppression.

4.2.8.4. Baidoa (South West state)

Baidoa is situated within the Bay–Bakool plateau at elevations ranging between 400 and 500 meters above sea level. Geologically, the area is underlain by Jurassic sedimentary formations, notably the Baidoa Formation, which is composed of thick limestone beds interbedded with marls, shales, and sandstones. These formations have undergone moderate weathering, and in some locations karstification has created aquifer systems that provide important groundwater resources. The surface geology is characterized by residual soils and alluvial deposits shaped under the prevailing semi-arid climate.

The soils of Baidoa are dominated by heavy clay Vertisols, which occur extensively on the gently undulating plains and depressions. These Vertisols are deep, dark clays with a very high shrink–swell potential. They crack widely during the dry season and become sticky and poorly drained when saturated during rains. Despite their challenging physical properties, Vertisols are naturally fertile soils with high cation exchange capacity and abundant calcium, though they are often deficient in organic matter and phosphorus. This fertility makes them particularly suitable for the cultivation of sorghum and maize, which form the backbone of agricultural production in the region and give Baidoa its reputation as one of Somalia's principal grain baskets.

Lighter soils such as Regosols and Leptosols are found on the upland sites and around settlements. These soils are sandy loams to loamy sands, better drained than the Vertisols, and more favorable for construction due to their reduced stickiness in wet conditions. In addition, deposits of alluvial soils occur in valley bottoms and seasonal drainage channels. These alluvial soils consist mainly of silty clay loams and sandy material, and while they are moderately fertile, they are susceptible to temporary waterlogging during heavy rainfall.

From a geotechnical perspective, the soils and geology of Baidoa present both opportunities and constraints. Vertisols, while agriculturally productive, pose challenges for building and infrastructure development because of their instability during wet seasons and their tendency to expand and contract with moisture changes. Foundations built on these soils are at risk of settlement unless proper engineering measures are applied. By contrast, the lighter Regosols provide more stable conditions for construction, while the underlying limestone bedrock, when encountered, offers strong foundation support. Drainage conditions are variable: Vertisols are poorly drained and prone to seasonal ponding, whereas Regosols and sandy deposits provide better natural infiltration.

Environmentally, the soils of Baidoa are prone to erosion, particularly when vegetation cover is removed. On bare slopes, Vertisols are vulnerable to cracking and surface runoff, while sandy Regosols are easily eroded by wind and water. Soil conservation measures are therefore critical in land management. Agriculture remains the most important land use, with rain-fed cereal farming dominating, while the geological formations also support groundwater extraction. The karstified limestone and marl aquifers beneath Baidoa are extensively tapped by boreholes, such as those operated by the Warjinay Water Company, which supply most of the town's piped water.

4.2.9. Waste Management

4.2.9.1. Baidoa – South West State

Baidoa's waste management system remains underdeveloped and fragmented. Solid waste is generated from households, markets, small industries and government institutions but is rarely segregated at source. Baidoa municipality and private operators collect only a fraction of the daily waste generated, with most being disposed of at uncontrolled open dumpsites on the outskirts of the city. Informal burning of household and market waste is widespread, contributing to localized air pollution. Plastic waste, particularly from packaging and water bottles, is abundant in drainage channels and open areas. Recycling is minimal, carried out only by informal waste pickers who collect plastics and metals for resale. Liquid waste management is even more limited; sewage infrastructure is absent, and households typically rely on pit latrines or septic tanks, many of which discharge untreated effluent into the environment. Overall, waste management in Baidoa is constrained by weak institutional capacity, limited municipal funding and a lack of designated sanitary landfill facilities.

4.2.9.2. Jowhar – Hirshabelle State

In Jowhar, solid waste management is almost entirely informal. The town lacks an engineered landfill or structured municipal waste collection system. Waste is commonly disposed of in open spaces, roadside ditches, or along riverbanks, where it accumulates and creates public health risks. Markets and commercial areas generate large amounts of organic waste, which is often dumped nearby or openly burned. Plastic and packaging waste is particularly visible in drains and public areas, leading to blockages during the rainy season. Household waste is managed at the family or community level, with residents frequently dumping or burning refuse near their homes. There is little to no separation of waste streams and recycling activities are limited to small-scale recovery of scrap materials by informal collectors. With Jowhar's location along the Shabelle River, unmanaged solid and liquid waste frequently contaminates water sources, exacerbating health vulnerabilities in the community. The absence of municipal waste infrastructure underscores the challenge of integrating waste management into new construction projects.

4.2.9.3. Dhuusamareb – Galmudug State

Dhuusamareb, the administrative capital of Galmudug State, faces similar waste management challenges. Municipal services for solid waste collection are limited and sporadic, with households and businesses largely responsible for their own disposal. The dominant practice involves dumping waste in nearby open grounds, roadside areas, or informal pits, where it accumulates without treatment. Burning of mixed solid waste is also common, releasing smoke and ash into surrounding neighborhoods. Organic waste from markets and households is typically mixed with plastics and other non-biodegradables, resulting in unsanitary heaps that attract pests. Formal waste segregation does not exist, and recycling activities are minimal, relying on informal waste pickers. Liquid waste management is equally inadequate, with pit latrines and septic tanks being the primary systems in use; in many cases, these overflow or leach into the surrounding environment during the rainy season. The absence of designated waste transfer points or controlled dumpsites highlights the city's weak institutional capacity for environmental services.

4.2.9.4. Kismayo – Jubbaland State

Kismayo, as a major port city, has somewhat more structured waste handling compared to inland towns, but capacity gaps remain significant. Solid waste is generated at high levels from households, commercial establishments, port activities and institutions. The municipal government, in collaboration with private contractors, undertakes partial collection services in central parts of the city, though

coverage is inconsistent. Much of the waste is still dumped at uncontrolled sites or burned in open spaces. Informal recycling is somewhat more visible in Kismayo, particularly for plastics, metals, and organic waste, reflecting the city's larger economic base and links to regional markets. However, there are no engineered landfills or sanitary disposal systems. Uncollected waste often accumulates along roadsides and in drainage channels, contributing to blockages during the rainy season. Liquid waste management is similarly weak, with reliance on septic tanks and pit latrines that frequently discharge untreated effluent. Despite Kismayo's larger size and commercial significance, waste management infrastructure remains inadequate to support growing urbanization.

4.3. Biological Environment

4.3.1. Flora

4.3.1.1. Baidoa (South West State)

The Baidoa site lies within the town center, where vegetation is naturally sparse due to urban development and the semi-arid climate. The broader landscape of Baidoa is dominated by Acacia–Commiphora bushland and grassland mosaics, but within the town, most of this natural cover has been cleared. At the project site itself, vegetation is extremely limited, with only a few plants growing along the fence line. The rest of the compound is largely bare ground with no significant natural vegetation cover. This reflects both the ecological conditions of Baidoa's semi-arid environment and the pressures of urbanization.

Image 5-6: View of existing vegetation on Baidoa site

4.3.1.2. Jowhar (Hirshabelle State)

Jowhar is in the Shabelle River basin, where riparian ecosystems and irrigated agriculture support greener landscapes than most parts of Somalia. The wider environment includes floodplain grasses, sedges, Acacia scrub and cultivated fields. Within the project site, vegetation is modest but notable compared to other sites: short grass covers much of the ground, interspersed with a few scattered trees across the compound. Additionally, there are small banana plantations within the compound, reflecting Jowhar's proximity to irrigated agriculture and its role as a productive farming hub along the Shabelle River.

Image 5-7: View of existing vegetation on Jowhar site

4.3.1.3. Dhuusamareb (Galmudug State)

Dhuusamareb lies in the semi-arid central region of Somalia, where xeric shrubland, Acacia, and thorny bushland dominate the natural vegetation. Vegetation is generally sparse, responding to seasonal rainfall. At the project site itself, the conditions mirror the surrounding ecology: the compound is largely bare ground with scattered thorny trees and shrubs. Vegetation density is low, and the scattered trees provide minimal canopy cover. This limited floral setting reflects both the harsh climatic conditions and the town's semi-urbanized setting, where natural vegetation has already been degraded.

Image 5-8: View of the site existing vegetation on Dhuusamareb site

4.3.1.4. Kismayo (Jubbaland State)

Kismayo has a distinct coastal and estuarine ecological setting, with mangroves and tidal vegetation present in the wider landscape. However, within the urban project site, vegetation is highly altered. The compound is covered mainly by short, drying grass and several scattered trees, giving it more visible greenery compared to Baidoa or Dhuusamareb but still limited in ecological diversity. These patches of grass and trees provide some shade and ground cover but are not part of the intact coastal vegetation. The nearest sensitive habitats of note are the mangrove and estuarine ecosystems outside the town, which lie beyond the project compound but remain important ecological receptors.

Image 5-9: Vegetation at the Kismayo project site

4.3.2. Fauna

The proposed project sites in Baidoa, Jowhar, Dhuusamareb, and Kismayo are all located within established town centers or administrative compounds. As such, no resident wild mammalian or reptilian species were observed during the site visits. The high levels of human settlement, construction activities, and clearance of natural vegetation have created environments unsuitable for sustaining terrestrial fauna. Livestock such as goats, sheep and donkeys are commonly found within the towns, but these are domesticated animals and not part of the natural wildlife baseline.

The only notable wildlife component observed across all sites is avifauna (birds). Towns and semi-urban compounds often provide perching and nesting opportunities for bird species that adapt well to human-modified landscapes.

These avifauna species are not endangered or threatened, but they represent the dominant ecological presence across the sites. Importantly, the project sites do not lie near sensitive habitats such as mangroves, wetlands, or protected areas that might support more diverse or vulnerable fauna.

4.4. Socio-Economic and Cultural environment

4.4.1. Social setting

4.4.1.1. Population

Reliable and recent demographic data for Baidoa, Jowhar, Dhuusamareb, and Kismayo are not clearly available, and there exists a significant data gap in terms of up to date, disaggregated urban population figures, particularly for the core city populations versus surrounding rural or internally displaced persons (IDP) settlements. Given these limitations, estimations drawn from older surveys or broader district-level data should be interpreted with caution. The ESIA thus uses the best available sources but recognizes that local authorities may possess more current figures which should be verified during project planning.

4.4.1.1.1. Johwar

Based on a Protection Analysis Update from August 2024, the total population of the Jowhar district in the Hirshabelle State of Somalia was estimated at 432,455 individuals. This figure includes both the resident and the internally displaced population. Of this total, approximately 35,752 people were recorded as internally displaced persons (IDPs) residing in 14 camps as of March 2024.

The demographic composition is defined by its clan structure, where most residents belong to the Hawiye clan, with the Abgaal being a prominent subclan. Meanwhile, minority clans, such as the Somali Bantus, make up most of the displaced population. Other minority groups in the district include the Shidle, Kaboolo, and Reer Shabelle. A notable portion of the population is also defined by its linguistic diversity, with Benadiri being the primary language spoken, while Maay and Mushunguli are spoken by minority groups.

4.4.1.1.2. Baidoa

Estimates for the population of Baidoa show a wide range, reflecting the challenges of gathering precise data in the region. According to a 2025 estimate the urban population is approximately 1.2 million, a figure that includes a significant number of internally displaced persons (IDPs). In contrast, earlier figures reported a much lower population for the city. For example, a 2014 UN assessment recorded a total district population of around 269,851, while a 2005 UNDP figure put the city's population at 370,000. The higher 2025 estimate is a testament to Baidoa's growth as a major hub for people fleeing conflict and drought, but a precise, uniform figure remains difficult to establish.

4.4.1.1.3. Dhuusamareb

For Dhuusamareb, the capital of Galmudug, population estimates typically cover the administrative district. A 2022 figure reported by datacoms put the Dhuusamareb District population at 434,080. Another, less specific report from August 2025, cited a population of "around 500,000," acknowledging the city's growth and its function as a political and economic center. These figures generally reflect the district's total population, which includes both the town of Dhuusamareb itself and the surrounding rural communities.

4.4.1.1.4. Kismayo

Kismayo's population estimates also vary depending on the source and the scope of the data. The city's metro area population is estimated to be 581,000 in 2025, according to data from the World Population Review. An earlier 2014 figure however, reported the city's population at 234,852, while the United Nations Development Programme reported an even lower figure of around 89,333 in 2005. The

larger modern figures reflect the population of the wider urban area and take into account factors such as returnees and displaced people who have moved to the port city.

4.4.1.2. Education

4.4.1.2.1. Baidoa (South West State)

The education sector in Baidoa has experienced gradual expansion in recent years, but significant gaps remain. Adult literacy in South West State follows the national pattern, with rates estimated at around 41%, though female literacy is considerably lower than male literacy. In Baidoa town, approximately 10 public schools and a similar number of private institutions operate, collectively enrolling more than 10,000 learners, including about 4,000 girls (Kirkon Ulkomaanapu, 2018). Baidoa University, a non-profit institution, also provides higher education opportunities. Despite these efforts, classroom shortages, limited teacher training, and resource gaps continue to undermine education quality. The large presence of internally displaced persons (IDPs) has placed additional pressure on schools, contributing to overcrowding and poor retention rates.

4.4.1.2.2. Jowhar (Hirshabelle State)

Education in Jowhar reflects both opportunities and persistent systemic challenges. Literacy levels remain low, consistent with national figures, and gender disparity in access is evident, with boys generally better represented in school enrolments. Jowhar has recently gained prominence as an educational hub after hosting the National Education Consultation Conference in 2025 and serving as the venue for the announcement of national secondary examination results. While these events underscore the state's growing role in federal-state education coordination, comprehensive data on enrolment, completion, and school infrastructure remain limited. Many schools in Hirshabelle still face poor facilities, understaffing, and resource shortages, with insecurity in surrounding rural areas further hindering educational access.

4.4.1.2.3. Dhuusamareb (Galmudug State)

The education system in Dhuusamareb remains fragile, shaped by both conflict dynamics and limited government resources. Adult literacy in Galmudug aligns with national averages, though youth literacy has shown some improvement due to recent stabilisation efforts. School rebuilding and rehabilitation projects have been launched in Dhuusamareb and surrounding areas, targeting infrastructure destroyed or neglected during years of instability (Halqabsi, 2023). However, challenges persist, including inadequate teacher welfare, highlighted by reports of nearly 500 teachers left without proper support in Dhuusamareb (Sunatimes, 2023). Enrolment levels, gender parity, and access to secondary education remain under-reported, but evidence suggests that school participation is constrained by insecurity, poverty, and limited infrastructure, with IDP children facing the highest barriers.

4.4.1.2.4. Kismayo (Jubbaland State)

Kismayo has witnessed renewed investment in education in recent years, though access and equity challenges remain. Adult literacy rates are broadly in line with the national average, with wide gender gaps. The city hosts more than 60 schools, including both public and private institutions (Rentech Digital, 2023), and is home to several NGO-supported initiatives. For example, Lutheran World Federation supports five primary schools with a combined enrolment of about 7,265 learners and operates a teacher training college to strengthen human resource capacity (LWF, 2023). In addition, ATMIS recently funded a new classroom block at Ahmed Gurrey Primary School, underscoring international support for the sector. Nonetheless, children in peripheral and conflict-affected areas around Kismayo, such as Jana Abdalle, still lack access to basic schooling (Radio Ergo, 2025).

Economic hardship, security concerns, and resource constraints continue to drive low enrolment and completion rates.

4.4.1.3. Health Care Services

4.4.1.3.1. Baidoa (South West State)

Healthcare services in Baidoa are provided through a mix of public hospitals, NGO-supported health centers, and private clinics, which together form the backbone of medical service delivery. Baidoa Regional Hospital, the largest facility in South West State, serves as a referral center offering maternal care, surgery, and emergency services, though it remains under-resourced and often overstretched (WHO Somalia Country Office, 2023). NGOs such as the Somali Red Crescent Society, Médecins Sans Frontières (MSF), and Action Against Hunger complement public health services by operating clinics, mobile outreach, and nutrition stabilization centers targeting malnourished children and vulnerable households. Due to the large population of internally displaced persons (IDPs) around Baidoa, humanitarian agencies play a vital role in filling service gaps, especially in primary healthcare, reproductive health, and vaccination campaigns. However, persistent insecurity, overcrowding, and lack of medicines continue to undermine service quality and access.

4.4.1.3.2. Jowhar (Hirshabelle State)

In Jowhar, healthcare delivery is anchored by Jowhar Regional Hospital, supported by several smaller health posts, private pharmacies, and NGO-operated clinics. Public facilities remain limited in capacity, often struggling with shortages of staff, equipment, and essential drugs (Somalia Ministry of Health, 2023). Humanitarian partners such as the International Committee of the Red Cross (ICRC), Somali Red Crescent, and WHO support health outreach, emergency response, and maternal care, particularly in peri-urban and rural areas where state facilities are inaccessible. Mobile clinics and vaccination campaigns are regularly deployed to serve displaced populations and flood-affected communities along the Shabelle River (IOM Somalia, 2023). Despite these interventions, health indicators remain poor, with high maternal and child mortality rates driven by limited access to skilled birth attendants, malnutrition, and recurring cholera outbreaks linked to poor water and sanitation infrastructure.

4.4.1.3.3. Dhuusamareb (Galmudug State)

Healthcare services in Dhuusamareb are delivered through a combination of government-run health posts, private clinics, and NGO-supported facilities. Dhuusamareb General Hospital serves as the main referral hospital in Galmudug, though it operates with limited equipment, specialist staff, and inconsistent supplies (WHO Somalia, 2023). Humanitarian organizations, including Save the Children and the Somali Red Crescent Society, provide critical services such as maternal and child health care, immunization campaigns, and mobile outreach to nomadic and displaced communities. Due to recurring insecurity in Galmudug, access to rural health services is highly restricted, and many patients must travel long distances to Dhuusamareb town for treatment. IDP settlements around the town heavily depend on NGO-supported clinics and temporary outreach programs. Gaps in secondary and tertiary healthcare remain significant, leading to reliance on referrals to Mogadishu for specialized services.

4.4.1.3.4. Kismayo (Jubbaland State)

Healthcare services in Kismayo are relatively better developed compared to many other regional capitals, though challenges remain. The Kismayo General Hospital serves as the primary referral hospital, providing outpatient, inpatient, maternal health, and emergency services, with support from the Jubbaland Ministry of Health and international partners (WHO Somalia Country Office, 2023).

Humanitarian actors, including Médecins Sans Frontières (MSF), the Somali Red Crescent Society, and the International Organization for Migration (IOM), play a central role in expanding healthcare access through mobile clinics, malnutrition programs, and cholera treatment centers. IDP camps around Kismayo, home to tens of thousands of displaced persons, rely heavily on NGO-supported health posts. While progress has been made in vaccination and maternal health, persistent insecurity in rural Jubbaland, combined with poor health-seeking behavior due to poverty and cultural barriers, continues to limit overall healthcare coverage.

4.4.1.4. Religion

Religion is a central and unifying pillar of life across Somalia, deeply shaping social, cultural, and political structures. Islam, predominantly Sunni, is universally practiced, and its values guide daily life, community interactions, and governance (Pew Research Center, 2022). Mosques are the most visible religious institutions in both urban and rural settings, serving not only as places of worship but also as centers for community dialogue, dispute resolution, and social support. Qur'anic schools (madrassas) are widespread, including in Baidoa, Kismayo, Dhuusamareb, and Jowhar, and remain an essential foundation for children's early education, often filling gaps left by limited access to formal schooling (Ministry of Religious Affairs, Somalia, 2022).

4.4.1.5. Housing, Settlement and Community Structures

4.4.1.5.1. Baidoa (South West State)

Baidoa presents a diverse housing and settlement pattern, reflecting its role as both an administrative center and one the IDP-hosting towns in Somalia. In the town center, permanent and semi-permanent houses made of stone, mud, and corrugated iron are common, alongside newer concrete structures. However, the rapid influx of internally displaced persons (IDPs) estimated at more than 600,000 people (IOM DTM, 2023) has transformed the settlement landscape. Large informal settlements made of makeshift shelters using tarpaulin, sticks, and iron sheets sprawl around the urban perimeter. These IDP camps often lack proper services such as sanitation, drainage, and safe water, increasing vulnerability to disease outbreaks. Community structures in Baidoa are strongly influenced by clan affiliations, religious institutions and humanitarian organizations that provide governance, dispute resolution, and service delivery in both host and displaced populations.

4.4.1.5.2. Jowhar (Hirshabelle State)

Settlement in Jowhar reflects its dual identity as an administrative capital and a productive agricultural town along the Shabelle River. The urban core is characterized by permanent and semi-permanent houses constructed from stone, iron sheeting and traditional Somali materials, while peri-urban areas host scattered traditional dwellings (aqal). The town also accommodates a significant IDP population displaced by recurrent flooding, drought and insecurity. These IDP settlements are semi-permanent and often established on marginal land, with minimal services and reliance on humanitarian assistance. Community structures are organized around a blend of formal governance institutions, religious leaders and clan-based systems, all of which play key roles in dispute resolution, social cohesion and resource sharing. The influx of IDPs has placed additional strain on urban infrastructure and shaped the town's settlement dynamics.

4.4.1.5.3. Kismayo (Jubbaland State)

Kismayo has a relatively more structured settlement pattern, shaped by its history as a major port and commercial hub. Permanent housing dominates the central and coastal zones, with stone and concrete buildings used for residential and commercial purposes. Peri-urban areas, however, contain informal settlements and temporary housing, especially for poorer households and some IDPs

displaced by drought or conflict in the wider Jubbaland region. Compared to Baidoa and Jowhar, the IDP presence in Kismayo is smaller but still notable. Community structures are diverse, with municipal governance complemented by traditional authority systems, religious networks and trade associations that mediate social and economic life. Kismayo's role as a trade and port city has also encouraged the growth of vibrant business communities, shaping the town's settlement expansion.

4.4.1.5.4. Dhuusamareb (Galmudug State)

Dhuusamareb exhibits a more modest settlement structure, reflecting its status as a semi-urban administrative capital. Housing in the central area consists of stone and iron sheet structures, with some permanent residential and commercial buildings interspersed with government offices. Surrounding areas feature traditional aqal and semi-permanent houses, highlighting the town's transitional rural-urban character. Unlike Baidoa and Jowhar, Dhuusamareb has not experienced large-scale IDP inflows, though small-scale displacement from nearby rural communities occasionally contributes to population growth. Community structures are primarily clan-based, supported by religious institutions and local governance, which play important roles in conflict resolution, mobilization, and local administration. Overall, settlement remains dispersed but is expanding steadily as the town consolidates its position as Galmudug's capital.

4.4.1.5.5. Land Use and Land Cover

The proposed project sites across the four towns are characterized by different patterns of land use and land cover, reflecting both the ecological setting and the extent of urban development.

In Baidoa, the land within the designated project site is largely bare, with compacted gravel dominating the surface. The site shows minimal vegetation cover, and its surroundings are characterized by residential houses and other informal housing structures. This indicates that the land is already under significant human use, with limited natural cover remaining.

In Dhuusamareb, the land is also predominantly bare with only a few scattered trees present. The project site accommodates key government installations, including the Ministry of Humanitarian and Disaster Management and the Ministry of Information, alongside nearby mosques and government storage facilities. The sparse vegetation and existing infrastructure reflect its mixed government and institutional land use.

In Jowhar, the site presents a different ecological setting, as it is covered with short grasses and scattered vegetation, in addition to the presence of banana plantations in the vicinity. The site also accommodates government ministry buildings, indicating a blend of agricultural land use with official institutional functions. The fertile nature of the Shabelle River valley influences this land cover pattern.

In Kismayo, the site is mainly covered by short, drying grasses typical of the semi-arid environment. Within the same compound, the Ministry of Finance offices are already located, complemented by a paved parking area. Pockets of vegetation also exist within the compound, providing limited green cover amid the built-up facilities.

4.4.1.6. Cultural Heritage

Across all four proposed project sites, no formally recognized sites of cultural or historical significance were identified within or immediately adjacent to the project areas. There are no registered monuments, archaeological remains, or heritage landmarks of national or regional importance situated on or near the designated lands.

The only notable cultural features present are mosques, which are located near most of the sites. These mosques serve not only as religious centers but also as important community hubs, reflecting the strong cultural and spiritual identity of the local populations. Given their role, care will be taken

during project implementation to ensure that construction activities do not interfere with access to these places of worship or disrupt religious practices.

4.4.2. Economic Activity

4.4.2.1. Livestock Production

Livestock rearing is a key livelihood across all four towns, though its importance varies. In Baidoa, livestock such as goats, sheep, and cattle dominate the local economy, traded in vibrant markets despite recurrent droughts that strain productivity. In Dhuusamareb, pastoralism is equally central, with camels, goats and sheep raised in the surrounding drylands and brought to town for trade, forming the backbone of household incomes. In Jowhar, livestock complements farming activities, with cattle, goats and sheep kept both for food and as an additional income source. In Kismayo, herding remains important in the hinterlands, but the town also serves as a key export hub for livestock through its seaport, connecting producers to regional and Gulf markets.

4.4.2.2. Crop Farming

Crop production varies significantly across the towns, reflecting local agro-ecological conditions. Baidoa engages in small-scale cultivation of sorghum and maize, though semi-arid conditions and water scarcity limit yields. Dhuusamareb has minimal agricultural production due to poor soils and erratic rainfall, with only small subsistence plots scattered around the outskirts. In Jowhar, however, agriculture thrives due to fertile soils and irrigation from the Shabelle River, making it one of Somalia's most productive farming centers with bananas, maize, sesame, and horticultural crops. Kismayo also benefits from fertile lands, where bananas, maize, sesame, and other cash crops are cultivated for both local use and export via the port.

4.4.2.3. Fishing

Fishing is an activity primarily associated with Kismayo, given its location along the Indian Ocean. Artisanal and small-scale fishers operate from the town's coastline, supplying both local markets and export channels through the port. Fish, lobsters and other marine resources are significant contributors to household livelihoods and trade. By contrast, Baidoa, Dhuusamareb, and Jowhar, being inland towns, have no fishing activities and rely instead on livestock and farming for subsistence and income.

4.4.2.4. Trade and Commerce

Trade and commerce are vital drivers of local economies in all four towns. In Baidoa, markets are busy with livestock sales, grain, firewood and imported goods and the presence of humanitarian actors has boosted demand for commodities. Dhuusamareb's commercial activity revolves around livestock, khat, food items and construction materials, supported by small shops and open-air stalls. In Jowhar, markets are fueled by agricultural produce bananas, maize and sesame alongside imports from Mogadishu and beyond. Kismayo, with its strategic seaport, is a hub of domestic and international trade, serving as a gateway for imported goods such as manufactured products and fuel, while exporting bananas, livestock and fish to regional markets.

4.4.2.5. Service Industries

The service sector provides an important share of livelihoods, especially in administrative capitals. In Baidoa, services are driven by humanitarian agencies, NGOs, and government employment, creating

opportunities in education, health, and hospitality. Dhuusamareb, as the capital of Galmudug, hosts many government offices and aid agencies, boosting demand for hotels, restaurants, and transport. In Jowhar, the seat of Hirshabelle State, government ministries and NGOs similarly generate employment and business opportunities, while also supporting agriculture-related services. In Kismayo, service industries are closely tied to port operations, with hotels, logistics companies, and financial institutions supporting traders, NGOs, and government institutions.

4.4.2.6. Transport

Transport is an essential economic activity across the four towns, linking markets, people and services. In Baidoa, local transport is mainly supported by minibuses, trucks, and motorbike taxis (bajaj) within the town and surrounding districts, while interstate connections are largely facilitated by domestic flights through Baidoa Airport. Dhuusamareb also relies heavily on motorbike taxis for urban mobility and trucks for moving goods locally, while long-distance travel is mostly by domestic air transport connecting the town with Mogadishu and other regions. In Jowhar, transport plays a dual role: road connections through Balcad link the town to Mogadishu, while local mobility relies on minibuses and motorcycles. The Shabelle River further supports the movement of goods and farm produce, complementing road-based transport. In Kismayo, the presence of a seaport and airport makes it a critical transport hub in southern Somalia. Road transport primarily connects the town to its hinterlands, while interstate and international movement is supported by domestic flights and maritime trade, reinforcing its role as a key logistics center for goods and passengers.

4.4.2.7. Construction and Real Estate Development

Over the past decade, Somalia has witnessed a steady rise in construction and real estate development, particularly in urban centers such as Baidoa, Dhuusamareb, Jowhar, and Kismayo. Reconstruction needs, rapid urbanization and increasing demand for residential, commercial, and institutional facilities have driven growth in this sector. Project areas are increasingly characterized by newly built compounds, government offices, paved courtyards, and a growing number of multistorey buildings.

The construction industry provides significant employment opportunities for both skilled and unskilled labour, supporting livelihoods for many urban households. Small contractors, masons, carpenters and daily wage labourers form the backbone of this workforce. At the same time, the sector faces persistent challenges, including weak regulatory enforcement on construction safety, limited adherence to environmental sustainability practices, and issues around land tenure security. Despite these constraints, construction and real estate development remain central to urban growth and modernization in all four towns.

4.4.2.8. Employment & Gender Dynamics

Unemployment remains a major socio-economic challenge across Baidoa, Dhuusamareb, Jowhar, and Kismayo, reflecting broader national patterns. According to the African Development Bank (2024), youth unemployment in Somalia is estimated at around 30.1%, while the overall national unemployment rate stands at approximately 21.7% (Somalia Economic Outlook, AfDB). Surveys conducted by the UN and World Bank similarly report high joblessness in urban areas, with the burden particularly pronounced among young adults and men attempting to transition from education into the labor market.

In the absence of sufficient formal employment, most residents rely heavily on the informal sector. Common livelihood strategies include driving motorcycle taxis (locally known as bajajs), street vending, casual domestic work and day labor on construction sites. These opportunities, though vital for survival, are marked by low wages, instability and a lack of social protections such as health insurance

or pensions. Construction work specifically provides temporary employment during the expansion of public infrastructure and housing developments in these urban centers.

Women are central actors in the economies of these towns, often sustaining families through small-scale trading, market vending, and running micro and home-based enterprises. According to the African Development Bank, women own about 45% of small and micro-enterprises nationally, a trend visible in local markets across the project towns. However, women continue to face systemic barriers, including lack of collateral for loans, restrictive financial policies, limited access to training, and competing household responsibilities. Initiatives such as AECF's "Finance for Inclusive Growth," supported by AfDB, have attempted to address these inequalities disbursing over US $10.3 million to women-led enterprises by 2023 but women still receive less credit and support compared to their male counterparts.

As a result, gender disparities in access to employment and income remain significant. While men dominate sectors such as construction, transport, and security, women are overrepresented in small-scale trade and low-paying informal services. These dynamics shape household income distribution, resilience to economic shocks, and the ability of both men and women to participate fully in the economic growth of Baidoa, Dhuusamareb, Jowhar, and Kismayo.

Moreover, diaspora remittances remain central to household economies, accounting for an estimated 23–30% of Somalia's GDP (World Bank, 2023). These remittances often provide critical support for daily consumption, education, healthcare, and small investments in business activities, cushioning families against the effects of high unemployment and weak local markets. In parallel, humanitarian assistance continues to play an essential role, particularly for internally displaced persons (IDPs) and other vulnerable households concentrated in Baidoa, Jowhar, and Kismayo. These forms of external support are not only safety nets but also important contributors to the local economic cycle, sustaining household resilience and community stability across the four towns.

4.4.3. Infrastructure and Utility

4.4.3.1. Energy Supply

Energy supply across the four project towns, Baidoa, Dhuusamareb, Jowhar, and Kismayo, is characterized by a hybrid system combining grid electricity, diesel generators, and solar power solutions. All the proposed project sites are located within urban centers that have access to existing town grids, and thus the new facilities will be connected to these electricity networks. However, while grid connections are available, power supply is often unreliable due to frequent outages, limited coverage, and fluctuating generation capacity.

To complement the grid, diesel-powered generators remain a dominant source of electricity for households, businesses, and public institutions. Generators provide backup during blackouts and serve as the primary source of power for many small enterprises, health centers, and schools that require a stable supply. Although effective, reliance on generators significantly increases the cost of electricity and contributes to environmental pollution through noise and emissions.

In recent years, solar energy has increasingly been adopted as a practical and sustainable alternative. Solar panels are now widely used at the household and institutional level, particularly for lighting, water pumping, and small-scale commercial activities. International development agencies, private sector actors, and humanitarian organizations have promoted solar energy as part of clean energy transition initiatives, and uptake has been strongest in towns with large internally displaced populations, where affordable, decentralized solutions are essential.

4.4.4. Water and Sanitation

4.4.4.1. Baidoa

In Baidoa, water supply is largely dependent on boreholes and shallow wells, with piped distribution systems serving only select areas of the town. During dry seasons, groundwater availability declines, forcing many households particularly those in informal settlements to rely on unprotected shallow wells, which are highly susceptible to contamination (UNICEF Somalia WASH Report, 2023). Sanitation services are very limited, with the absence of a centralized sewerage system. Most households depend on pit latrines or septic tanks, while in IDP settlements, shared latrines are common, often in poor condition and without proper waste disposal facilities (IOM Somalia, 2023). These deficiencies increase the risk of waterborne diseases such as acute watery diarrhea and cholera, which remain a recurrent public health threat in Baidoa, especially during periods of flooding and displacement (WHO Somalia, 2023).

4.4.4.2. Kismayo

Kismayo relies primarily on boreholes for its municipal water supply, supplemented by piped distribution to certain parts of the city, while many peri-urban communities continue to rely on shallow wells. Seasonal fluctuations affect water quality and availability, with higher turbidity levels and contamination risks noted during the dry season (UNICEF/WHO Joint Monitoring Programme, 2023). Like other Somali towns, Kismayo lacks a central sewerage network, and households depend on on-site sanitation systems such as septic tanks and pit latrines. In IDP settlements, reliance on shared or makeshift facilities remains widespread, increasing exposure to fecal contamination and disease outbreaks (IOM Somalia Displacement Monitoring Matrix, 2022). Cholera and other diarrheal diseases are reported regularly, leading to emergency WASH interventions, including water trucking and hygiene promotion campaigns coordinated by NGOs and the Ministry of Health (WHO Somalia, 2023).

4.4.4.3. Dhuusamareb

In Dhuusamareb, access to clean water is constrained by limited infrastructure. Boreholes and shallow wells remain the main sources of water, with distribution largely managed through small-scale vendors and community-level systems. The absence of a centralized water supply system means that households face frequent shortages and variable water quality, particularly during prolonged dry periods (Somalia WASH Cluster, 2023). Sanitation infrastructure is similarly underdeveloped, with most households using pit latrines, while open defecation remains a challenge in some peri-urban areas. IDP settlements in Dhuusamareb are especially vulnerable, with sanitation facilities often overcrowded and unhygienic (IOM Somalia, 2023). These gaps heighten the risk of outbreaks of waterborne diseases, prompting regular hygiene promotion and cholera vaccination drives by humanitarian partners (WHO Somalia, 2023).

4.4.4.4. Jowhar

Jowhar, situated in the Shabelle River basin, has relatively better groundwater recharge compared to central Somali towns, yet access to safe drinking water remains limited. Communities rely on a combination of shallow wells, boreholes, and small-scale piped systems, but flooding during rainy seasons often contaminates water points and increases the risk of disease transmission (FAO Somalia, 2023). The sanitation situation mirrors that of other regional towns, with no municipal sewerage system in place. Households depend on basic pit latrines or septic tanks, while in rural and IDP settings, shared facilities are common and frequently inadequate (UNICEF Somalia, 2022). Seasonal flooding exacerbates sanitation challenges, as latrines overflow and contaminate surface

water sources. This has contributed to repeated outbreaks of cholera and acute watery diarrhoea in Jowhar, necessitating regular WASH emergency responses (WHO Somalia, 2023).

4.4.5. Vulnerable Groups

The proposed construction activities across the four project towns Baidoa, Jowhar, Kismayo, and Dhuusamareb may affect vulnerable groups to varying degrees depending on the location and surrounding land use. Persons with disabilities (PWDs) are at particular risk of reduced mobility and safety challenges, as construction work often involves temporary road blockages, uneven pathways, and debris. Without appropriate mitigation measures, these conditions could restrict safe access to essential services and public spaces.

In Jowhar, Kismayo, and Dhuusamareb, the proposed sites are located within government compounds, which significantly reduces the direct exposure of community members to construction-related disturbances. While this setting minimizes the likelihood of major impacts on local vulnerable populations, groups such as PWDs, women employees, and youth who access these compounds for services may still experience challenges if construction activities are not managed carefully. Ensuring accessible routes, adequate sanitation facilities, and proper safety signage will be essential to safeguard these groups.

In contrast, the project site in Baidoa is embedded within a community setting, surrounded by residential areas, small businesses, and informal vendors. This proximity heightens the likelihood of impacts on vulnerable groups, particularly women, youth, low-income households, and children who frequent the surrounding areas. Informal street vendors may face economic displacement due to disruptions in pedestrian flow and reduced customer access, while women and youth could be disproportionately exposed to construction nuisances such as dust, noise, and restricted access to sanitation. Children living or studying nearby are also at risk of accidental exposure to unsafe construction zones if adequate protective barriers and awareness campaigns are not in place.

Although internally displaced persons (IDPs) are not concentrated immediately at the construction sites, they form part of the broader urban populations in Baidoa and Jowhar. Their limited access to public information and essential services may reduce their ability to prepare for or adapt to any disruptions resulting from the project. Consequently, special attention should be directed toward ensuring inclusive communication, safety awareness, and community engagement so that all vulnerable groups particularly those around Baidoa are adequately considered during project implementation.

4.4.6. Occupational and Community Health and Safety

Across the proposed project sites in Kismayo, Jowhar, Dhuusamareb, and Baidoa, there are important occupational and community health and safety considerations that must be addressed during construction and subsequent operation.

In Kismayo, the project site is located within the Ministry of Finance compound, adjacent to the Ministry of Trade. Occupational health and safety risks will primarily affect ministry staff and construction workers. Construction activities such as excavation, demolition, material storage, and vehicle movement may expose workers to accidents, dust inhalation, noise pollution, and other hazards. The close proximity of other ministries means disruptions could affect daily government operations, requiring careful coordination and protective measures.

In Jowhar, the project site lies within the same compound as the Ministries of Finance, Planning, Interior, and Commerce. This setting creates a similar occupational risk profile, where both ministry staff and construction workers may be affected. Potential hazards include dust, noise, slips, trips, and restricted access to office facilities. The fact that multiple ministries operate in the same space

heightens the need for effective safety protocols and phased construction to minimize disruptions to essential administrative services.

In Dhuusamareb, the project site is within a government complex that hosts the Ministry of Humanitarian and Disaster Management as well as the Ministry of Information. Construction activities here may disrupt ministry operations and pose risks to employees and visitors. Construction workers will face risks such as working at heights, handling heavy materials, and exposure to dust and noise. The confined setting makes it critical to establish controlled access and stringent occupational safety measures to protect both workers and ministry staff.

In Baidoa**,** the project site is situated next to a main road and near restaurants, business premises, and residential areas. Unlike the other sites, community health and safety risks here extend beyond government staff to include local traders, pedestrians, and residents. Construction operations may result in dust emissions, noise, increased heavy vehicle traffic, and possible road obstructions, all of which could disrupt daily community activity and increase accident risks. Nearby businesses and restaurants may also experience disturbances, while residents could face temporary discomfort and safety concerns.

5. STAKEHOLDER ENGAGEMENT

The stakeholder engagement meetings for the planned construction of the Revenue Collection Offices were held between 28th August and 7th September 2025 as a central component of the Environmental and Social Impact Assessment (ESIA) process. These engagements were conducted in accordance with Somalia's national regulatory framework and the African Development Bank's (AfDB) Integrated Safeguards System (ISS).

Public consultation and participation are legal requirements under the Federal Government of Somalia's Environmental Impact Assessment Regulations, which mandate the meaningful involvement of affected and interested stakeholders throughout the planning, design, and implementation phases of the project. This principle is further reinforced by AfDB's Operational Safeguard 1 on Environmental and Social Assessment, which emphasizes inclusive, transparent, and timely engagement to enhance project legitimacy, quality, and sustainability.

The purpose of these meetings was to ensure free, prior, and informed consultation with stakeholders who may be affected by or have an interest in the project. Participants were provided with comprehensive information on the project's objectives, activities, potential risks, and proposed mitigation measures. They were also given the opportunity to offer feedback that could influence project design and implementation. This reflects the Ministry of Finance and Revenue Authority's commitment to participatory development, environmental accountability, and social inclusion.

The engagement process was led by senior representatives from the respective state Ministry of Finance and Revenue Authority, supported by technical officers and ESIA consultants.

Stakeholders raised several key issues that directly informed the development of a responsive and inclusive Environmental and Social Management Plan (ESMP). Major concerns included:

- **Continuity of Services**: Minimizing disruption to government revenue operations during construction
- **Environmental Safeguards**: Effective management of construction waste, dust, and noise, alongside the adoption of sustainable building practices
- **Employment Opportunities**: Ensuring transparent, fair, and inclusive job opportunities, with priority given to local youth and women
- **Health and Safety**: Strengthening occupational health and safety measures for staff, construction workers, and surrounding communities
- **Communication and Accountability**: Establishing clear communication channels and a functional Grievance Redress Mechanism (GRM)

The consultations were conducted through meetings, site visits, and technical briefings in the following towns:

- **Baidoa (South West State)**: 7th September 2025
- **Jowhar (Hirshabelle State)**: 3rd September 2025
- **Dhuusamareb (Galmudug State)**: 28th August 2025
- **Kismayo (Jubbaland State)**: 31st August 2025

By engaging stakeholders early and comprehensively across these towns, the project has ensured that the planned Revenue Collection Offices will modernize financial infrastructure and promote sustainability, inclusivity, safety, and institutional accountability.

5.1. Objectives of the Consultation Workshop

- Share clear and reliable information on the project's scope, purpose, timelines, and potential impacts.
- Collect stakeholder insights, concerns, and perspectives for project design and implementation.
- Ensure continuous engagement so that stakeholder concerns, expectations, and grievances are addressed throughout the project lifecycle.
- Involve stakeholders in planning and implementing any required resettlement, compensation, or disruption management measures.
- Build trust, transparency, and cooperation between the project team, government institutions, and affected stakeholders.

Notifying Stakeholders of the ESIA

In compliance with Somalia's Environmental Impact Assessment Regulations and the African Development Bank's (AfDB) Integrated Safeguards System (ISS), the Ministry of Finance, together with the respective State Revenue Authorities, formally notified stakeholders about the Environmental and Social Impact Assessment (ESIA) for the proposed construction of Revenue Collection Offices in Baidoa, Jowhar, Dhuusamareb, and Kismayo.

The notification process was carried out primarily through **official mail correspondence and direct phone calls**, ensuring that both institutional and community-level stakeholders were reached in a timely and reliable manner. Stakeholders contacted included revenue authority staff, relevant state ministries, municipal officials, business representatives, women's groups, youth leaders, and other affected or interested parties.

The notifications provided:

- A clear outline of the project objectives and scope.
- An overview of the anticipated environmental and social impacts.
- Information on the ESIA process and opportunities for stakeholder input.
- Details of the dates, venues, and formats of the upcoming consultation sessions.

Following this notification, stakeholder engagement meetings were successfully convened between 28th August and 7th September 2025 in the four towns as follows:

- Dhuusamareb (Galmudug State): 28th August 2025
- Kismayo (Jubbaland State): 31st August 2025
- Jowhar (Hirshabelle State): 3rd September 2025
- Baidoa (South West State): 7th September 2025

5.2. Methodology and Approach

The stakeholder engagement process for the ESIA of the proposed construction of Revenue Collection Offices in Baidoa, Jowhar, Dhuusamareb, and Kismayo was designed to be inclusive, transparent, and participatory. Consultations were undertaken with a broad range of stakeholders including State Ministries of Finance, Revenue Authority staff, municipal officials, business representatives, women and youth groups, environmental experts, and other potentially affected persons (PAPs).

The engagement aimed to capture views and concerns related to the planning, construction, and operational phases of the project, ensuring that both institutional and community-level perspectives were considered.

A variety of participatory methodologies were applied, including:

- **Focus Group Discussions (FGDs):** Conducted with Revenue Authority staff, small traders, women's groups, and youth representatives. These created safe spaces for participants to express concerns on issues such as service disruption, noise, dust, traffic management, and expectations for employment opportunities.
- **Key Informant Interviews (KIIs):** Held with design consultants, environmental specialists, local government leaders, and institutional managers to obtain expert and technical perspectives on project risks, safeguards, and operational considerations.
- **Plenary Meetings and Briefings:** Open sessions allowed stakeholders to receive project information, ask clarifying questions, and provide direct input on anticipated impacts and proposed mitigation measures.
- **Site Visits:** Organized to allow participants to directly observe the proposed construction areas, enabling context-specific discussions on safety, accessibility, and land use.

5.3. Stakeholder Engagement Strategy

Stakeholder engagement is a critical component in identifying and addressing the environmental and social risks, potential impacts, and opportunities associated with the construction of new Revenue Collection Offices in the four state capitals. The project emphasizes inclusive participation and consistent, transparent communication with stakeholders throughout all phases of planning, construction, and eventual operation of the facilities.

The core objectives of this engagement strategy are:

- To provide Revenue Authority staff, surrounding government institutions, traders, businesses, and local communities with clear information on project timelines, activities, and anticipated impacts, as well as accessible feedback channels.
- To raise awareness and deepen understanding of the project's purpose, design, and benefits, alongside the potential risks and mitigation measures during construction and operational phases.
- To reaffirm the commitment of the Ministry of Finance and Revenue Authority to best practices in environmental management and the safeguarding of worker and community health, safety, and security.
- To ensure the availability of a **Grievance Redress Mechanism (GRM)** through which stakeholders can voice concerns, complaints, or suggestions and receive timely and appropriate responses.

To ensure transparency and accessibility of information during the planning and construction phases, the Ministry of Finance, in collaboration with State Revenue Authorities, will implement targeted communication and engagement activities as follows:

- **Project Signboards (English and Somali):** Informational boards will be installed at each project site and along key access roads. These will provide essential details such as the project purpose, construction timelines, implementing agencies, and official contact numbers for inquiries or complaints.

- **Official Website Updates:** Project updates, reports, and notices will be posted on the Ministry of Finance and respective State Ministries' official websites, in both English and Somali. Any changes in project scope, schedule, or activities will be disclosed publicly with explanations of potential environmental and social impacts.
- **Local Media and Radio Announcements:** Key project milestones, safety messages, and opportunities (such as employment or procurement) will be communicated through widely accessible local radio stations, which are the most reliable source of information for many community members.
- **Direct Notifications:** Letters, emails, and phone calls will be used to notify key institutional stakeholders such as nearby government offices, business associations, municipal councils, and community leaders.
- **Community and Institutional Meetings:** Regular meetings will be organized with relevant stakeholders to provide updates, clarify concerns, and collect feedback, ensuring a two-way flow of information.

5.4. Sharing of Reports and Documents

To promote transparency and ensure public access to key project information, the Ministry of Finance and the respective State Revenue Authorities will make the following documents available to the public through their official websites. Hard copies will also be accessible upon request at designated government offices in Baidoa, Jowhar, Dhuusamareb, and Kismayo:

- **Non-Technical Summary (NTS):** A simplified overview of the Revenue Collection Offices project, outlining its objectives, potential environmental and social impacts, and proposed mitigation measures, presented in a format accessible to non-specialists.
- **Stakeholder Engagement Plan (SEP):** A document detailing the strategies and approaches used to engage stakeholders throughout the project lifecycle. This will include the **Grievance Redress Mechanism (GRM)**, which sets out clear procedures for lodging, addressing, and resolving concerns or complaints from stakeholders.
- **Environmental and Social Impact Statement (ESIS):** The full report providing a comprehensive assessment of potential environmental and social impacts of constructing the new Revenue Collection Offices, together with recommended mitigation, monitoring, and management measures.

5.5. Grievance Mechanism

A dedicated Grievance Mechanism will be established in each state to handle concerns and complaints from project-affected persons, including neighboring communities and other stakeholders around the project sites. The mechanism will ensure that all grievances are managed promptly, transparently, and respectfully. Project staff responsible for grievance handling will receive targeted training, with emphasis on understanding community perspectives and maintaining effective, respectful communication.

Potential Grievances During the Construction Phase

Grievances may arise due to activities and impacts associated with the demolition and construction of the new Revenue Collection Offices, including:

- Accidents involving staff, visitors, or neighboring community members.
- Excessive dust, noise, and vibrations affecting businesses and residents nearby.

- Security risks in and around the project site.
- Conflicts between construction workers and residents.
- Improper disposal of debris or spoil material encroaching on public or private land.
- Soil instability or erosion leading to damage of nearby infrastructure.
- Strain on water resources from construction activities.
- Limited job opportunities for local community members.
- Concerns about unsafe or unfair working conditions for construction workers.
- Structural cracks or damages to nearby offices, shops, or houses caused by heavy machinery.

Potential Grievances During the Operational Phase

Once the Revenue Collection Offices are operational, grievances may include:

- Negative impacts on surrounding businesses or livelihoods.
- Traffic congestion or accidents caused by project vehicles or increased visitor numbers.
- Fire hazards or inadequate emergency response.
- Fuel spills or emissions from office facilities.
- Excessive noise from office operations or service activities.
- Social disruptions related to population influx.
- Employee strikes or dissatisfaction due to poor working conditions.
- Limited employment opportunities for residents.
- Reckless driving by project-related vehicles.

Project Grievance Committee (PGC)

A Project Grievance Committee (PGC) will be established to address and resolve complaints that may arise during both the construction and operational phases of the project. The committee will consist of representatives from the state-level Project Implementation Unit (PIU), the Employer's representatives, officials from the relevant local government authorities, and the designated community liaison person.

Grievance Register (GR)

A Grievance Register (GR) will be maintained at the proposed Revenue Collection Offices in each state to record all grievances, complaints and concerns raised by stakeholders for consideration by the State Ministry of Finance Project Implementation Unit (PIU). The register will be placed in an accessible location within the project site office or nearby administrative office to ensure easy access for complainants.

The register will capture the following information:

- Date of entry
- Name and contact information of the complainant
- Description of the grievance
- Complainant's signature
- Action taken or reason the grievance was not addressed
- Signatures of both the Grievance Committee and the complainant indicating closure of the grievance
- Date of resolution

Grievance Handling Procedure

A structured two-stage grievance redress mechanism will be applied throughout the construction and operation of the proposed revenue collection offices in Baidoa, Jowhar, Dhuusamareb, and Kismayo. The mechanism is designed to ensure grievances are addressed fairly, promptly, and transparently, while also respecting community perspectives.

Stage 1: Internal Resolution Mechanism

Grievances may be submitted verbally or in writing to the Project Grievance Committee (PGC) or to the respective local administration office. Upon receipt, the PGC will review and categorize the complaint. If the issue is unrelated to the project or does not involve a directly affected party, it may be dismissed with justification.

For valid complaints, the PGC will:

- Investigate the matter promptly and engage with the complainant.
- Consult with relevant district-level technical officers such as those from the Community Development Office, Environmental Office, or Security agencies, depending on the grievance.
- Work to resolve the grievance within three (3) working days wherever possible.

The project manager will be involved in cases requiring higher-level technical input or oversight. This process prioritizes local dialogue and swift corrective measures to avoid escalation.

Stage 2: Legal Redress through State Courts

If grievances remain unresolved through the internal process, complainants retain the constitutional right to seek legal redress through the formal court systems of the respective Federal Member States.

Similarly, the Ministry of Finance may pursue legal or administrative action in cases where project implementation is deliberately obstructed, including but not limited to:

- Vandalism or destruction of project signage and equipment
- Theft or misuse of project materials with community involvement or negligence
- Harassment or intimidation of project staff or contractors
- Use of abusive or threatening language against project personnel

In such circumstances, the Ministry will collaborate with state-level judicial and administrative institutions to protect the project's integrity, ensure compliance with the law, and maintain a safe working environment.

5.6. Stakeholder Analysis Matrix

A Stakeholder Analysis Matrix and mapping exercise was undertaken for the proposed construction of new Revenue Collection Offices in Kismayo, Baidoa, Dhuusamareb, and Jowhar. This exercise was conducted in line with the environmental and social assessment requirements of the Federal Ministry of Environment and Climate Change as well as relevant international standards, to capture stakeholder views and concerns on the potential environmental and social impacts of the projects.

The process considered the legal and institutional frameworks guiding stakeholder consultation and information disclosure in each of the four Federal Member States, with a particular focus on ensuring meaningful participation and transparency throughout the ESIA process.

The key steps in the stakeholder engagement process included:

- **Identifying and notifying relevant stakeholders** in Kismayo, Baidoa, Dhuusamareb, and Jowhar about the Environmental and Social Impact Assessment (ESIA). Notifications were delivered through official letters, emails, and phone calls.
- **Conducting both formal and informal stakeholder engagement meetings**, including workshops, focus group discussions, and key informant interviews at the state and local levels.
- **Providing stakeholders with opportunities to review and comment** on draft reports, project documents, and design elements to ensure their concerns were integrated into the planning and implementation stages.
- **Documenting all feedback received** and maintaining a record of how comments and concerns were addressed. This documentation will be made publicly accessible to promote accountability and transparency.

The stakeholder analysis exercise was aimed at assessing the interests, concerns, and influence of various actors (excluding the project proponent) and identifying opportunities, risks, and relationships that may influence or be influenced by the proposed revenue office projects. The findings informed the stakeholder engagement strategy, ensuring inclusive participation and that the voices of affected communities, institutions, and civil society groups were effectively integrated into the ESIA process.

5.6.1. Project Site Context and Stakeholder Scope

The proposed revenue collection office projects are located across four towns Baidoa, Jowhar, Kismayo, and Dhuusamareb, each with unique institutional and community contexts that shape the scope of stakeholder engagement.

- **Baidoa (South West State):** The project site is situated on government-owned land but lies near surrounding communities and business centers. This positioning required that consultations extend beyond institutional stakeholders to include neighboring residents, traders, and community representatives whose daily activities may be influenced by the construction and future operation of the facility.
- **Jowhar (Hirshabelle State):** The proposed site is located within a secured government compound that houses the State Ministry of Finance, Planning, Commerce, and Interior. Engagement in Jowhar therefore focused primarily on state ministry officials, technical staff, and institutional representatives working within the compound, with less emphasis on external community members given the controlled setting.
- **Kismayo (Jubbaland State):** In Kismayo, the proposed revenue collection office will be constructed within the fenced compound of the State Ministry of Finance. The site's secured and exclusive nature meant that stakeholder consultations were concentrated on ministry staff, government technical officers, and other institutional actors operating within the compound.
- **Dhuusamareb (Galmudug State):** The project site in Dhuusamareb is located within the compound of the State Ministry of Humanitarian and Disaster Management. Similar to Jowhar and Kismayo, the fenced government premises limited the scope of directly affected parties to institutional stakeholders and ministry staff, although provisions were also made to engage nearby government offices and supporting agencies.

Overall, while three of the sites (Jowhar, Kismayo, and Dhuusamareb) are securely located within government compounds, Baidoa's proximity to communities and business centers required a broader scope of engagement to ensure that both institutional and local community perspectives were integrated into the ESIA process.

5.6.2. State-Specific Stakeholders Analysis Matrix

Stakeholder Category	Interests	Opportunities	Threats	Linkages/Involvement with the Project
Community Representatives	Safety, reduced disruption, fair inclusion	Mobilize communities, provide feedback	Resistance if excluded, misinformation	Attend consultations, support mobilization
Business Representatives	Business continuity, supply opportunities	Create local supply chains	Access disruption, noise/dust	Provide goods/services, share feedback
Ministry of Finance Staff	Safe work environment, operational efficiency	Technical input	Disruption during works	Project ownership, regular staff updates
Ministry of Public Works	Standards compliance, infrastructure alignment	Oversight role	Bureaucratic delays	Review & approve designs
Ministry of Environment & Climate Change	Environmental safeguards	Technical guidance	Weak enforcement	ESIA review, co-monitoring
Municipality/District	Service oversight, community welfare	Mobilize communities	Political interference, weak resources	Facilitate disclosure & local support
Youth Representatives	Employment, capacity building	Provide labour	Frustration if excluded	Engagement in labour roles
Women Representatives	Safety, equal opportunities	Gender inclusion	Marginalization risk	Feedback on gender-sensitive design
PWD Representatives	Accessibility & fair participation	Promote inclusive design	Exclusion if ignored	Review designs, ensure access

Table 6- 1: Baidoa Stakeholders Analysis Matrix

5.6.2.1. Johwar Stakeholders Analysis Matrix

Stakeholder Category	Interests	Opportunities	Threats	Linkages/Involvement with the Project
Ministry of Finance	Modern offices, functionality	Project ownership	Disruption to services	Technical input, oversight
Ministry of Interior	Security, order	Coordinate site access	Safety concerns	Joint planning & oversight
Ministry of Commerce & Trade	Business environment	Economic linkages	Overlooked needs	Input on design relevance
Ministry of Environment & Climate Change	Safeguards, compliance	Co-monitoring	Weak implementation	Technical review & monitoring
Ministry of Planning	Alignment with state development	Policy guidance	Limited technical staff	Coordination on development goals
Youth Representatives	Jobs, empowerment	Labour opportunities	Resistance if excluded	Employment in project activities
Women Representatives	Equal opportunities	Gender-sensitive jobs	Exclusion	Consultations on women's needs
Religious Leaders	Stability, moral leadership	Advocate for support	Opposition if uninformed	Awareness sessions, mediation
Elderly Representatives	Safety, respect	Provide wisdom	Resistance if excluded	Advisory & local mediation

Table 6- 2: Jowhar Stakeholders Analysis Matrix

5.6.2.2. Kismayo Stakeholders Analysis Matrix

Stakeholder Category	Interests	Opportunities	Threats	Linkages/Involvement with the Project
Ministry of Finance	Operational space, functionality	Project ownership	Service disruption	Technical oversight
Ministry of Trade	Trade support	Economic growth	Conflicting priorities	Input on design relevance
Ministry of Public Works	Standards compliance	Oversight role	Bureaucratic delays	Design review & approval
Ministry of Environment & Climate Change	Environmental protection	Co-monitoring	Weak enforcement	Environmental monitoring
Youth Representatives	Employment	Labour opportunities	Exclusion	Involvement in labour
Women Representatives	Inclusion, safety	Gender empowerment	Gender exclusion	Consultation & feedback

Table 6- 3: Kismayo Stakeholders Analysis Matrix

5.6.2.3. Dhuusamareb Stakeholders Analysis Matrix

Stakeholder Category	Interests	Opportunities	Threats	Linkages/Involvement with the Project
Ministry of Finance	Functional, safe workspace	Project ownership	Service disruption	Consultations, technical review
Ministry of Environment & Climate Change	Safeguard compliance	Technical oversight	Weak enforcement	Co-monitoring
Ministry of Public Works	Standards & infrastructure	Technical input	Delays	Joint planning
Ministry of Information	Public awareness	Communication	Poor information flow	Use as disclosure channel
Ministry of Humanitarian & Disaster Mgmt	Disaster readiness	Risk management	Overlooked concerns	Integrate DRR measures
Youth Representatives	Employment, capacity	Labour opportunities	Exclusion	Involvement in project works
Women Representatives	Safety, opportunities	Empowerment	Marginalization	Consultations, targeted roles

Table 6- 4: Dhuusamareb Stakeholders Analysis Matrix

5.7. Stakeholders' Discussions

5.7.1. Stakeholder Discussions – Dhuusamareb

Stakeholder consultations in Dhuusamareb brought together key government institutions, civil society representatives, and community groups to discuss the proposed construction of the modern revenue collection center under the Integrated Somalia Economic Governance Project (ISEGP). The consultations were inclusive, ensuring participation from ministries (Finance, Environment, Public Works, Interior, Information,and Humanitarian Affairs), as well as youth and women representatives from the community.

The discussions highlighted broad support for the project, with stakeholders recognizing its potential to enhance institutional capacity, strengthen domestic revenue mobilization, and reduce reliance on external aid. The Ministry of Finance emphasized that the project addresses long-standing challenges associated with reliance on rented facilities, thereby providing a permanent and sustainable solution to service delivery constraints.

Participants raised several environmental concerns, particularly soil erosion, waste management, water contamination, noise, dust generation, and vegetation loss within the compound. These issues were noted as critical risks that require proactive management through mitigation measures such as erosion control, dust suppression, safe waste disposal, and protection of existing vegetation.

On the social and operational side, stakeholders pointed to possible disruptions to government operations during construction. Concerns included restricted access to offices, increased traffic within the compound, and exposure of staff and visitors to construction-related risks. Calls were made for strong occupational health and safety measures, proper scheduling of works to minimize service disruption, and provision of temporary off-site facilities to ensure continuity of essential services.

Community representatives emphasized the need for inclusion and equity, particularly in employment opportunities. Special attention was drawn to prioritizing local labor, women, and youth, with fair recruitment processes to avoid exclusion. The Ministry of Labour reinforced this by stressing adherence to national labor laws, prohibition of child labor, and enforcement of worker safety standards. Sensitization on HIV/AIDS and gender-based violence (GBV) was also proposed to promote a safe and informed workforce.

Stakeholders further underscored the importance of transparent grievance management. It was agreed that a Grievance Redress Mechanism (GRM) should be established, offering accessible channels such as complaint boxes, phone lines, and email contacts, with a dedicated officer to manage complaints promptly and fairly.

Overall, the consultations demonstrated strong community and institutional ownership of the project. The dialogue reinforced the need for a balanced approach that maximizes the governance and economic benefits of the ISEGP while minimizing environmental, social, and operational risks. Stakeholders committed to continuous monitoring, open communication, and inclusive implementation to ensure that the project delivers sustainable outcomes for Dhuusamareb and Galmudug State.

5.7.2. Stakeholder Consultations – Kismayo

During the stakeholder consultations in Kismayo, a wide range of actors were engaged to ensure that all relevant interests and concerns were captured. The Ministry of Finance staff representatives welcomed the project, noting that it would modernize revenue collection and improve service delivery. However, they raised concerns about temporary disruption of office functions and staff safety during construction, emphasizing the need for continuity of services and regular project updates. The Ministry of Public Works underscored the importance of strict compliance with national building codes, use of

durable materials, and adherence to safe structural design, recommending close technical supervision throughout the construction phase.

Officials from the Ministry of Trade highlighted the opportunities the project would bring to local commerce, particularly for small and medium enterprises through supply chain linkages. They also advocated for the procurement of local materials and services to maximize economic benefits. At the same time, the Ministry of Environment and Climate Change representatives raised environmental concerns, including dust, noise, solid waste management, and drainage, and recommended the establishment of a comprehensive Environmental Management and Monitoring Plan with clear mitigation measures.

Community voices were strongly represented, with youth leaders pushing for fair and transparent recruitment processes, urging for training and employment opportunities for young people. Women's representatives emphasized equal employment opportunities for women, especially in support roles such as catering, cleaning, and administration, while also requesting improved sanitation facilities during and after construction. Local business representatives expressed their interest in participating in the supply chain but raised concerns about possible strain on utilities and rising operational costs.

Community liaisons stressed the need for awareness campaigns to address concerns over dust, noise, restricted access, and safety risks for residents living near the site. Security officers warned of potential risks such as theft and sabotage, recommending fencing, surveillance, lighting, and strong coordination with local police. Finally, municipal and district authorities expressed strong support for the project, citing its governance and economic benefits. They encouraged the incorporation of traffic management and drainage solutions into the site planning and offered assistance in mobilizing community support to ensure smooth project implementation.

5.7.3. Stakeholder Engagement – Johwar

The stakeholder consultation in Jowhar brought together representatives from multiple ministries, local community members, and technical experts, providing a platform for open discussion on the proposed construction of the two-story Revenue Collection Centre within the government compound. The Director of Internal Audit of the Ministry of Finance opened the meeting by highlighting the importance of the ISEGP for improving revenue governance, strengthening institutional capacity, and enhancing transparency. Participants agreed that the project would address the limitations of the current overcrowded and inadequate office facilities, which are unable to meet the growing needs of staff and service users.

Stakeholders discussed a wide range of potential environmental, social, and economic impacts. Concerns were raised over dust, noise, vibration, and soil erosion during construction, alongside risks of water contamination and improper solid waste management. The loss of vegetation and temporary visual impacts from stockpiles and construction debris were also noted. On the operational side, participants identified increased demand for water, energy, and sanitation services, together with higher levels of waste and emissions. Socio-economic concerns included congestion at the compound gate, restricted access to offices, and temporary disruptions to ministry operations. However, positive impacts were also highlighted, such as employment opportunities for local youth and women, contracts for local suppliers, and long-term institutional efficiency gains once the facility becomes operational.

The discussion then focused on mitigation measures. Environmental safeguards such as water spraying, restricted construction hours, covered trucks, sediment control, and protection of existing vegetation were strongly recommended. Restoration of disturbed areas through replanting and landscaping was also emphasized to preserve Jowhar's green environment. On social safeguards, participants proposed clear access routes, signage, staggered deliveries, fencing, and enforcement of PPE use to minimize risks to both workers and ministry staff. Equal employment opportunities for

women and youth were stressed, with stakeholders calling for transparent recruitment systems and inclusion of women in oversight committees. Ministries also shared their institutional perspectives: Finance stressed alignment with national strategies and oversight of budget allocations; Public Works insisted on durable materials and compliance with building codes; Trade emphasized the importance of engaging SMEs; and the Ministry of Environment recommended a robust Environmental Management and Monitoring Plan to address pollution and biodiversity impacts.

Community representatives strongly supported the project but emphasized the importance of equitable benefit-sharing. They urged that local workers and small businesses be given first priority, and that safety concerns especially for women and girls, be integrated into project planning. They also recommended sensitization of workers on HIV/AIDS and GBV issues to ensure a safe working environment. A Grievance Redress Mechanism (GRM) inclusive of women, youth, and vulnerable groups was widely endorsed as essential to maintain transparency and accountability.

Overall, stakeholders expressed strong support for the project, viewing it as a vital investment in governance reform and local development. They agreed that environmental protection, inclusive participation, and strong institutional oversight must remain at the center of implementation. The project team responded by committing to prioritize local hiring, integrate gender-sensitive approaches, establish an inclusive GRM, and prepare a comprehensive ESMP to address all identified concerns. The session concluded with mutual agreement that continued engagement and transparency would be critical to ensuring the project's success in Jowhar.

5.7.4. Stakeholder Engagement – Baidoa

The stakeholder engagement meeting on the proposed Revenue Collection Centre in Baidoa brought together government representatives, community stakeholders, and technical experts to review and discuss the Environmental and Social Impact Assessment (ESIA). The meeting was an important step in ensuring that local perspectives inform the planning and implementation of the project.

The consultation revealed strong recognition of the importance of establishing a permanent revenue office. Stakeholders agreed that the current rented facilities are inadequate, both in terms of size and sustainability, and that investment in modern infrastructure will improve service delivery, reduce long-term costs, and provide a more dignified working environment for staff. The project was therefore widely welcomed as a critical institutional development for the South West State.

At the same time, participants raised several environmental and social considerations that will need careful management. It was confirmed that the project site is government-owned and unoccupied, but its location within a residential area means that surrounding communities may experience indirect impacts during construction. These include noise, dust, vibration, and temporary restrictions on access. Stakeholders stressed the importance of preventive measures, clear communication, and prompt mitigation of any unintended consequences to ensure good relations with nearby households.

Environmental sustainability was another recurring theme. Although the site is mostly bare, stakeholders highlighted the need for responsible site preparation, preservation of the few existing trees, and effective waste management. They recommended integration of climate-resilient design features such as proper drainage and green infrastructure to reduce risks of flooding and heat stress. The Ministry of Environment committed to supporting environmental restoration through tree planting once construction is completed, with community participation encouraged to promote ownership and long-term care of the new green spaces.

Social dimensions of the project were also discussed in depth. Women's groups and youth representatives emphasized the importance of equitable benefit-sharing, especially through job creation during construction and service delivery phases. Gender considerations were highlighted, with calls to ensure that women, including those heading households, have access to opportunities and safe public facilities. Elders stressed that cultural practices and community values must be

respected throughout the project cycle, while residents requested greater transparency and involvement in decision-making to build trust and avoid misunderstandings.

The engagement underscored the need for structured mechanisms to sustain dialogue between the project team and the community. Participants recommended the establishment of a grievance redress system that is transparent, accessible, and responsive. They also proposed a community liaison committee comprising elders, women, youth, civil society, and government officials to serve as a platform for feedback, oversight, and collaboration. Such mechanisms were seen as vital to ensuring accountability and safeguarding community interests.

Overall, the meeting demonstrated broad community support for the Revenue Collection Centre, coupled with a clear expectation that the project will be implemented in a socially responsible and environmentally sustainable manner. Stakeholders expressed optimism about the benefits but also called for careful attention to construction impacts, fair opportunities for local people, and long-term environmental stewardship. The Ministries involved committed to coordination, transparency, and adherence to both national safeguard requirements and international best practices.

The consultation process thus succeeded in identifying opportunities, risks, and community priorities that should shape project design and implementation. By integrating these perspectives, the Revenue Collection Centre has the potential not only to strengthen public finance management but also to reinforce trust between government and citizens while contributing to local development in Baidoa.

5.8. Summary of Concerns and Risks Identified

Across the four towns, stakeholders raised several environmental, social, and operational concerns. Environmental risks included dust generation, soil erosion, loss of vegetation, and poor solid and liquid waste management. In Kismayo, stakeholders emphasized coastal ecosystem risks and drainage challenges, while in Jowhar concerns focused on wastewater and vegetation clearance. In Baidoa, given its proximity to communities and business centers, stakeholders highlighted potential noise, traffic disruptions, and community safety issues. Social concerns were consistent across all towns, with requests for prioritization of local employment (particularly for youth and women), fair recruitment practices, and inclusion of vulnerable groups. Women's groups stressed the need for gender-sensitive facilities, safety during construction, and opportunities in catering and cleaning services. Youth groups raised issues of transparency in recruitment and the need for skill-building programs. Security agencies in all four towns highlighted risks of theft, sabotage, and instability due to the sensitive nature of government facilities.

5.9. Summary of Responses and Commitments

The project team committed to comprehensive environmental and social management measures. Dust suppression, erosion control, vegetation protection, drainage systems, and proper solid and liquid waste management will be integrated into construction and operation. Designs in Jowhar and Kismayo include strong drainage and flood-resilience measures, while Kismayo's coastal setting will be safeguarded through ecosystem-sensitive approaches. Socially, the project team pledged to prioritize local labor recruitment, ensure transparent hiring processes, and include youth and women in employment and training opportunities. Gender-sensitive sanitation facilities will be installed, and women will be considered for support services such as catering and cleaning. Occupational Health and Safety (OHS) plans will be implemented to safeguard workers, prohibit child labor, and promote safe practices. Security management plans covering fencing, lighting, surveillance, and coordination with security agencies were confirmed for all sites. Additionally, a Grievance Redress Mechanism (GRM) will be established in all towns to ensure communities and institutions can voice concerns.

5.10. Outcomes and Way Forward

The stakeholder engagement process achieved broad consensus and buy-in from both government institutions and community representatives. Ministries expressed strong support, emphasizing alignment with national and state-level development priorities. Communities welcomed the projects, provided that local employment and fair opportunities are honored. Women's and youth groups demonstrated willingness to participate actively in project-related activities, strengthening social ownership. Security agencies agreed to collaborate closely to ensure project safety. Going forward, the project team will operationalize the Environmental and Social Management Plan (ESMP) and Grievance Redress Mechanism (GRM) in all four sites. Regular monitoring, joint oversight with relevant ministries, and transparent reporting will be undertaken to ensure commitments are implemented. The outcomes reflect a shared understanding that the projects are not only infrastructure investments but also opportunities for inclusive socio-economic empowerment, improved governance and strengthened institutional resilience across Baidoa, Jowhar, Kismayo, and Dhuusamareb.

5.11. Conclusion

The stakeholder engagement process across Baidoa, Jowhar, Kismayo, and Dhuusamareb fostered inclusivity, transparency, and collaboration, with active participation from government ministries, local authorities, community representatives, women, youth, and vulnerable groups. Stakeholders raised key concerns on environmental risks, waste and drainage management, health and safety, gender inclusion, security, and employment opportunities, which were acknowledged and addressed through commitments to implement robust mitigation measures, prioritize local hiring, establish gender-sensitive approaches, and set up a grievance redress mechanism. The process resulted in broad stakeholder acceptance and a strong sense of ownership, with participants expressing support for the projects and confidence that, with sustained engagement and effective monitoring, the initiatives will align with national priorities while delivering long-term social, environmental, and institutional benefits.

6. IMPACT IDENTIFICATION AND ASSESSMENT

This chapter identifies and evaluates the potential environmental and social impacts of the proposed construction of modern revenue collection offices under the Institutional Support for Economic Governance Project (ISEGP). The assessment covers all project phases, pre-construction, construction, operation, and potential decommissioning and considers direct, indirect, and cumulative effects.

The methodology integrates desktop review, field observations, and stakeholder consultations (held between 28th August and 7th September 2025 in Dhuusamareb, Jowhar, Kismayo and Baidoa). The approach aligns with the AfDB Integrated Safeguards System (ISS) and Somalia's Environmental Management Act (2024).

Impacts are assessed against five criteria **magnitude**, **duration**, **reversibility**, **spatial scale**, and **likelihood** and are classified into a risk rating (Low, Moderate, High, or Very High). Mitigation measures are provided in the Environmental and Social Management Plan (ESMP).

6.1. Impact Characterization and Evaluation

6.1.1. Impact Identification

The identification of impacts was based on activity-based analysis of sub-project phases, including site clearance, construction of new facilities, and subsequent operation and maintenance. These activities were cross-referenced with baseline conditions such as physical environment (air, water, soil, noise, vibration), ecological systems, health and safety, cultural heritage, socio-economic well-being, and institutional governance. Data was sourced from:

- Field consultations with local communities, authorities, and institutions.
- On-site observations and surveys, including environmental and socio-economic features.
- Professional judgment grounded in multidisciplinary expertise.
- Desktop reviews of relevant legislation, satellite imagery, and previous studies.

This comprehensive process enabled the generation of a consolidated list of potential impacts, reflecting both site-specific risks and broader systemic issues.

6.1.2. Impact Characterization

Each potential impact was further characterized to determine its significance and management requirements. The attributes considered included:

- **Nature of Impact**: Positive or negative.
- **Type**: Direct (e.g., dust emissions), indirect (e.g., traffic congestion), cumulative (e.g., urban pressure from multiple infrastructure projects).
- **Temporal Scale**: Short-term (construction-phase noise), medium-term (construction traffic disruption), long-term (operational energy demand).
- **Spatial Scale**: Localized (within the compound), regional (adjacent communities or institutions), or systemic (urban service demand).
- **Reversibility:** Reversible (temporary access restrictions) or irreversible (land-use change).
- **Frequency and Duration:** Continuous, intermittent, or seasonal.

- **Sensitivity of Receptors:** With heightened consideration for vulnerable groups, community institutions, and densely populated neighborhoods near the project sites.

6.1.3. Mitigation Measures

For each significant negative impact, mitigation measures were proposed following the mitigation hierarchy:

- **Avoidance:** Preventing impacts through design or phasing adjustments (e.g., scheduling noisy activities during daytime hours).
- **Minimization:** Reducing the severity of unavoidable impacts (e.g., dust suppression and noise barriers).
- **Restoration/Rehabilitation:** Reinstating disturbed areas or services after temporary disruption (e.g., landscaping and access restoration).
- **Compensation/Offsetting:** Addressing residual impacts that cannot be fully mitigated (e.g., livelihood support where minor disruptions to vendors occur).

6.1.4. Risk Assessment/Rating

An Environmental and Social Risk Assessment was undertaken to assign qualitative risk scores based on likelihood and severity of impacts. Risks were categorized in line with AfDB safeguard classifications and the World Bank's Environmental and Social Framework (ESF):

- **High Risks:** Occupational accidents, hazardous waste exposure, and safety/security concerns.
- **Moderate Risks:** Dust and noise pollution, surface water contamination, construction traffic congestion.
- **Low Risks:** Minor visual disruptions, localized operational waste generation.

Based on cumulative evaluation across all four sites, the projects were assigned a Medium Environmental and Social Risk rating (Category 2). This indicates that while the projects carry site-specific risks, these are largely predictable, localized, and manageable with well-defined mitigation measures. Consequently, the development and implementation of a robust ESMP will be central to ensuring that environmental and social risks are effectively managed, while the positive socio-economic and institutional governance benefits are maximized.

6.2. Potential Positive Environmental Impacts

6.2.1. Economic and Employment Benefits

6.2.1.1. Employment Creation Across Project Phases

- **Jowhar (Hirshabelle State):** Local labor, particularly in construction and site preparation, will be employed, helping reduce high unemployment levels in the flood-prone region. Temporary jobs during construction will improve household incomes and support livelihoods affected by seasonal flooding.
- **Kismayo (Jubbaland State):** Port city dynamics will allow skilled and semi-skilled employment in construction, logistics, and equipment handling, benefiting local youth and informal workers. The project will also create opportunities for local vendors supplying building materials and services.

- **Dhuusamareb (Galmudug State):** Employment opportunities will contribute to economic empowerment in a central state capital, stimulating local markets and supply chains for construction materials.
- **Baidoa (South West State):** Jobs will provide income in an arid, semi-rural context where economic opportunities are limited. Recruiting local labor will support household resilience and skill development.

6.2.1.2. Stimulation of Local Economy

- Local SMEs in all sites will benefit from increased demand for construction materials, transport, catering, and accommodation.
- Staff and construction personnel will spend locally on food, lodging, and transport, creating a ripple effect in town economies.

6.2.2. Institutional and Governance Strengthening

6.2.2.1. Enhanced Government Efficiency and Productivity

- Each revenue office will centralize state-level financial administration, improving workflow and coordination in towns where services are often fragmented.
- Digitalized workspaces and modern facilities will enhance staff efficiency and reduce administrative delays in revenue collection.

6.2.2.2. Promotion of Good Governance and Fiscal Transparency

- Facilities will strengthen accountability in tax and revenue management, enhancing citizen trust in government operations in each state.
- Real-time reporting and digital record-keeping will support transparency and reduce corruption risks.

6.2.3. Urban Infrastructure and Environmental Sustainability

6.2.3.1. Modern, Climate-Resilient Design

- **Jowhar:** Elevated building design and stormwater management will reduce flood risks.
- **Kismayo:** Incorporation of coastal climate-resilient features, such as wind protection and heat mitigation.
- **Dhuusamareb:** Solar energy systems and passive ventilation will address energy constraints in a semi-arid environment.
- **Baidoa:** Landscaping with drought-resistant native plants will conserve water and improve local biodiversity.

6.2.3.2. Improved Waste and Water Management

- All offices will include solid waste segregation, temporary storage areas, and improved sanitation systems, promoting environmental hygiene.

- Efficient plumbing systems and water-saving fixtures will conserve resources in water-scarce regions like Baidoa and Dhuusamareb.

6.2.3.3. Contribution to Urban Renewal

- Replacing vacant or poorly utilized sites with modern offices will improve town aesthetics, reduce urban blight, and encourage orderly urban development in all four cities.

6.2.4. Social and Community-Level Benefits

6.2.4.1. Improved Public Access to Services

- Citizens will gain closer access to revenue collection services, reducing travel time to central or state capitals.
- Facilities will include accessible ramps, signage, and waiting areas for persons with disabilities, women, and elderly citizens.

6.2.4.2. Community Pride and Symbolism

- Modern revenue offices will symbolize state presence and stability in regions with limited government infrastructure.
- Towns will gain pride from seeing visible investment in public service delivery, fostering civic engagement.

6.2.4.3. Gender and Inclusion Opportunities

- Gender-sensitive hiring and mentorship programs will promote participation of women and youth in both construction and operations.
- Local capacity-building initiatives will empower marginalized groups in each state.

6.2.5. Long-Term Strategic Benefits

6.2.5.1. Strengthened Fiscal Capacity

- Improved efficiency in revenue collection will enhance domestic resource mobilization for each state, enabling reinvestment in local services such as health, education, and roads.

6.2.5.2. Resilience to Climate and Security Risks

- Office designs will be resilient to regional climate risks: flooding in Jowhar, coastal storms in Kismayo, arid heat in Baidoa, and windstorms in Dhuusamareb.
- Integrated safety measures will protect staff, citizens, and assets in all locations.

6.2.5.3. Reduced Operational Costs

- Energy-efficient lighting, ventilation, and water systems will lower utility expenses and allow funds to be redirected to other development priorities.

6.2.6. Positive Impact Matrix

Impact	Description	Beneficiaries/Receptor	Likelihood	Magnitude	Significance	Enhancement Measures
Employment Creation	Direct employment of skilled, semi-skilled, and unskilled workers during planning, construction, and operations	Local workforce, youth, women	High	High	High	Prioritize local recruitment, provide training and skill development programs, ensure safe working conditions
Indirect Employment and Economic Stimulus	Local SMEs and service providers benefit from increased demand for materials, transport, catering, and accommodation	Local businesses, suppliers	High	High	High	Engage local suppliers, support small businesses, encourage inclusive procurement policies
Improved Government Efficiency	Centralized offices with modern ICT systems enhance revenue collection, record-keeping, and interdepartmental workflow	Government staff, local residents	High	High	High	Provide adequate equipment, training, and digital infrastructure to optimize operations
Enhanced Fiscal Transparency	Digitized systems, secure storage, and real-time reporting reduce errors and corruption	Citizens, government	High	High	High	Implement proper IT security, regular audits, and staff training on financial systems
Climate-Resilient and Sustainable Design	Energy-efficient lighting, solar panels, natural ventilation, water-saving fixtures, and stormwater management	Environment, community	High	Moderate	High	Incorporate renewable energy, water conservation, and sustainable building materials
Urban Greening and Aesthetics	Landscaping with native plants, tree planting, and green spaces improves micro-climate and town aesthetics	Community, environment	High	Moderate	High	Use drought-resistant and native species, maintain green areas regularly

Impact	Description	Beneficiaries/Receptor	Likelihood	Magnitude	Significance	Enhancement Measures
Improved Waste and Sanitation Facilities	Segregated waste management and improved sanitation set standards for public buildings	Community, staff	High	Moderate	High	Provide collection points, recycling options, regular waste removal, hygiene awareness
Enhanced Access to Services	Local citizens gain convenient access to revenue offices, reducing travel and cost	Residents, businesses	High	High	High	Include accessible entrances, ramps, elevators, signage, and climate-controlled waiting areas
Community Pride and Symbolism	Modern, well-maintained offices reflect state presence and progress	Local communities, government	High	Moderate	High	Engage communities during construction, maintain clean and secure facilities
Gender and Social Inclusion	Opportunities for women, youth, and marginalized groups in employment and training	Women, youth, marginalized populations	High	Moderate	High	Implement gender-sensitive hiring, training, and mentorship programs
Resilience to Climate and Security Risks	Buildings designed to withstand floods, wind, and high temperatures; integrated security features	Staff, citizens, assets	High	Moderate	High	Incorporate resilient materials, secure entry points, fire detection and suppression systems
Reduced Operational Costs	Energy-efficient systems lower electricity and water expenses	Government, taxpayers	High	Moderate	Moderate	Monitor energy and water use, maintain systems efficiently
Urban Renewal and Infrastructure Improvement	Modern office replaces vacant or dilapidated sites, reducing blight and promoting orderly urban development	Community, local government	High	Moderate	High	Maintain landscaping, functional design, and integrate offices with local planning initiatives

Impact	Description	Beneficiaries/Receptor	Likelihood	Magnitude	Significance	Enhancement Measures
Capacity Building and Skills Development	Training during construction and operations enhances local workforce capacity	Local workforce, youth	High	Moderate	High	Provide formal training programs, workshops, and apprenticeships

Table 7- 1: Positive Impact Matrix

6.3. Potential Negative Impacts

6.3.1. Pre-Construction Phase Impacts

The pre-construction phase includes **site preparation, land acquisition, and limited demolition (in Baidoa, Jowhar, and Dhuusamareb)**. Potential impacts are mainly temporary but can be significant if unmanaged.

6.3.1.1. Key Impacts

- Possible short-term livelihood interruption for informal vendors due to construction works.
- Community safety concerns due to site clearance activities.
- Waste generation from demolition debris.
- Risk of exclusion of women and VMGs from compensation or consultation processes.

6.3.1.2. Livelihood interruption

In Jowhar, Kismayo and Dhuusamareb, the proposed offices will be constructed on existing government-owned, fenced land; therefore, no land acquisition or livelihood impacts are anticipated. In Baidoa, the selected site lies within a community and business setting where construction activities may cause possible short-term livelihood interruption for informal vendors due to construction works**.** These impacts are expected to be temporary and can be minimized through proper planning, stakeholder engagement, and maintenance of access routes during the construction period.

6.3.1.3. Soil Disturbance and Erosion Risk

Pre-construction activities such as site grading, excavation, and leveling may disturb topsoil, leaving it exposed to erosion during rainfall. Soil compaction from machinery mobilization may alter drainage patterns and reduce soil permeability.

6.3.1.4. Dust and Noise Nuisance

The movement of equipment, grading, and preliminary excavation works will generate dust and moderate noise levels. This may affect nearby residents, businesses, and institutions, especially in urban settings like Baidoa.

6.3.1.5. Utility Disruption

Pre-construction activities may interfere with underground or overhead utilities such as power lines, drainage channels, or water supply systems. Any disruption could inconvenience surrounding communities and delay project timelines.

6.3.1.6. Traffic and Community Safety

Mobilization of construction machinery and delivery trucks to the site may temporarily increase local traffic, cause congestion, and pose safety risks for pedestrians and motorists. This is particularly relevant in Baidoa, where the site is in a community setting with busy roads.

6.3.1.7. Occupational Health and Safety Risks

Workers involved in early site preparation face risks such as accidents from handling equipment, slips and falls on uneven terrain, and exposure to dust and noise without adequate personal protective equipment (PPE).

6.3.1.8. Labor Influx and GBV/SEAH Risks

The arrival of contractors and preliminary workers from outside the locality may lead to a temporary increase in population. This could strain limited services, create social tensions, or increase vulnerabilities to Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA), and Harassment (SEAH), especially in community-proximate sites like Baidoa.

6.3.2. Pre-Construction Impact Matrix

Impact	Magnitude	Duration	Reversibility	Scale	Avoidable?	Consequences / Costs & Benefits
Land take and livelihood considerations	Medium	Short term	Reversible	Site specific	Partially	Construction will take place on existing government or designated public land; therefore, no land acquisition or displacement is expected. Possible short-term livelihood interruptions for nearby informal vendors may occur during construction, which can be minimized through proper site planning, stakeholder engagement, and access management.
Land preparation (fencing, clearing of debris,demolotion	Low	Short-term	Reversible	Site specific	Yes	Minor disturbance; enables site readiness.
Noise & dust from site surveys, mobilization	Low	Short-term	Reversible	Local	Yes	Temporary nuisance, manageable.
Utility connections (water, electricity)	Medium	Medium-term	Partially reversible	Local	Partially	Temporary strain on local services; long-term benefit in improved access.
Stakeholder and community disruption during planning	Low	Short-term	Reversible	Local	Yes	Possible conflicts if engagement is poor; proper consultation builds trust.

Table 7- 2: Pre-Construction Impact Matrix

6.3.3. Pre-Construction Phase Risk Characterization

Impact	Severity	Extent	Duration	Reversibility	Likelihood	Overall Risk Rating
Land Take & Resettlement (planning stage)	High	Community-wide	Long-term	Irreversible	Moderate	High
Noise & Dust from Mobilization/Surveys	Low–Moderate	Localized	Short-term	Reversible	High	Moderate
Utility Connections (temporary strain)	Moderate	Community-wide	Short to Mid-term	Reversible	Moderate	Moderate
Stakeholder & Community Disruption (during planning)	Moderate	Localized	Short-term	Reversible	Moderate	Moderate

Table 7- 3: Pre-Construction Phase Risk Characterization

6.3.1. Negative Impacts During Construction Phase – Consolidated for All Four Sites

6.3.1.1. Introduction

The construction of revenue collection offices in Jowhar, Kismayo, Dhuusamareb, and Baidoa will involve site preparation, excavation, demolition of existing structures where necessary, transportation and storage of building materials, concrete works, and use of heavy machinery. These activities are expected to generate a range of environmental and social impacts. Given the similar nature of construction works, most of these impacts are universal across the four sites, with differences only where baseline conditions vary, particularly in relation to vegetation clearance

The construction phase presents the highest level of environmental and social risk due to heavy machinery, increased labor presence, and resource use.

6.3.1.2. Key Impacts

- Air quality deterioration from dust and emissions.
- Noise and vibrations impact on nearby communities.
- Occupational health & safety risks for workers.
- Community disruption from traffic and congestion.
- GBV/SEAH risks due to labor influx.
- Solid waste generation (construction materials, packaging, etc.).
- Positive impacts: local employment opportunities (targeting ≥60% unskilled labor from local communities).

6.3.1.3. Land Access and Livelihood Considerations

The project sites have been strategically selected on government-owned land, eliminating the need for land acquisition and avoiding any resettlement impacts. In Jowhar, Kismayo, and Dhuusamareb, the proposed offices are located within existing fenced government compounds, ensuring minimal interference with community activities. In Baidoa, however, the site is situated within a community setting surrounded by small businesses and public activities. As such, there is a likelihood of temporary community disturbances and minor interruptions to nearby business operations during construction. These impacts are expected to be short-term and manageable through effective stakeholder engagement, careful scheduling of works, and maintenance of access routes to minimize inconvenience.

6.3.1.4. Loss of Vegetation

The extent of vegetation clearance varies across the sites. In Jowhar and Kismayo, clearing shrubs, grasses, and occasional small trees will reduce local carbon sequestration capacity and eliminate habitat for small fauna such as birds and reptiles. This clearance may also increase soil erosion risks by exposing surfaces to rainfall and wind, while reducing the aesthetic quality of the site. In Dhuusamareb, vegetation is sparse, and impacts will be minimal, though visual effects will still be noticeable. In Baidoa, the site is largely urban with limited greenery, so impacts are mostly confined to loss of shade and reduced visual amenity.

6.3.1.5. Impacts on Fauna

Although the sites are predominantly urban or peri-urban, small fauna such as insects, reptiles, rodents, and birds may be displaced during vegetation clearance and construction. Noise, vibrations, and continuous human activity will further disturb these species, potentially reducing their numbers in the immediate area. While the ecological impact is not large-scale, it represents a localized disturbance to urban biodiversity.

6.3.1.6. Air Pollution

Construction activities will generate substantial dust and particulate matter from excavation, earthworks, demolition, and material handling. Heavy trucks and diesel-powered machinery will emit nitrogen oxides, sulfur oxides, carbon monoxide, and particulate matter, all of which degrade air quality. Vulnerable populations—including children, the elderly, and individuals with pre-existing respiratory conditions—will be disproportionately affected. Reduced visibility caused by airborne dust may also create traffic hazards. Without suppression measures, cumulative dust and exhaust could significantly deteriorate the ambient air environment.

6.3.1.7. Noise Pollution and Vibrations

Operation of heavy equipment such as bulldozers, excavators, and concrete mixers, combined with metal cutting and hammering, will elevate noise levels throughout the construction period. Vibrations from these activities can cause physical discomfort and, in some cases, structural damage to nearby buildings, particularly older or poorly maintained ones. Sensitive receptors such as hospitals, schools, and residential houses near the project sites may experience significant disruption. Additionally, in conflict-affected contexts like Somalia, loud noises may trigger psychological stress by evoking memories of gunfire or explosions.

6.3.1.8. Water Pollution (Surface and Groundwater)

Construction activities pose risks of contaminating both surface and groundwater. Accidental spills of fuels, oils, and lubricants from machinery can seep into soils and reach aquifers. Improper disposal of concrete washout water and other chemical residues may further pollute water sources. During rainfall events, sediment-laden runoff from exposed soils can clog drainage systems and reduce water quality downstream. Communities dependent on shallow wells and boreholes are particularly vulnerable to these risks, as contamination can affect domestic and drinking water supply.

6.3.1.9. Increased Pressure on Urban Utilities and Services

Construction will significantly increase demand for water and electricity to support workers, equipment, and material processing. In towns with fragile utility systems, this heightened demand could result in service disruptions for local communities. Transport networks will also face additional pressure from heavy truck movements, leading to accelerated road degradation, congestion, and inconvenience for commuters. Failure to coordinate with local authorities may amplify these stresses on already limited urban infrastructure.

6.3.1.10. Soil Pollution, Compaction, and Erosion

The movement of heavy machinery will compact soils, reducing their permeability and altering natural infiltration and drainage. Leaks of fuels, oils, and hazardous substances may result in localized soil contamination, rendering areas unproductive for future vegetation growth. Moreover, exposed soils at

construction sites are vulnerable to erosion from rainfall and wind, leading to sedimentation of drainage channels and potential downstream flooding.

6.3.1.11. Solid Waste Generation

Large quantities of solid waste will be produced, including soil, rubble, packaging materials, metal offcuts, and wood scraps. Hazardous wastes such as paints, solvents, oils, and asbestos-containing materials from demolition of old structures present specific health and environmental risks if not managed properly. Uncontrolled dumping could contaminate soil and water, attract pests, and create hazards for both workers and surrounding communities.

6.3.1.12. Liquid Waste Generation

Liquid waste streams will include greywater from worker facilities, sewage from temporary sanitation systems, stormwater mixed with construction debris, and slurry from concrete washing. Poorly managed liquid waste can infiltrate groundwater or contaminate surface water sources. Stagnant wastewater may create breeding grounds for mosquitoes, contributing to increased risks of malaria and other vector-borne diseases.

6.3.1.13. Traffic Impacts

Heavy truck traffic transporting materials, equipment, and waste will increase congestion on local roads, especially in urban centers with narrow or poorly maintained road networks. The influx of construction vehicles raises the likelihood of road accidents involving pedestrians, motorcyclists, and other vehicles. Increased dust emissions from moving trucks may further reduce visibility and air quality, compounding risks for road users.

6.3.1.14. Population Influx and Socio-Cultural Disruption

The mobilization of non-local workers into project sites will temporarily increase population levels, straining housing, food supplies, water resources, and health services. Cultural differences between the workforce and host communities may create tensions or misunderstandings. If left unmanaged, the influx may foster resentment, weaken social cohesion, and even provoke conflict.

6.3.1.15. Occupational Safety and Health Hazards

Construction sites inherently present high safety risks. Workers may suffer injuries from machinery accidents, falls from heights, electrocution, exposure to hazardous materials, or heat stress due to harsh climatic conditions. Without strict safety protocols, provision of personal protective equipment (PPE), and emergency preparedness, the likelihood of accidents and fatalities is significant.

6.3.1.16. Community Health and Safety

Communities near construction zones may face health hazards from dust inhalation, excessive noise, and traffic accidents. Children, in particular, may be attracted to construction sites, exposing them to risks from open excavations and heavy machinery. Daily business and household routines may be disrupted by blocked access routes or restricted mobility. Inadequate emergency response systems could exacerbate the severity of community health incidents.

6.3.1.17. Visual Impacts and Aesthetics

During the construction phase, sites will be visually unattractive, with piles of debris, dust emissions, and heavy machinery altering the character of the surroundings. The temporary visual intrusion may negatively affect community perceptions, local businesses, and property values in the vicinity of the sites.

6.3.1.18. Security Risks

The concentration of valuable construction equipment, materials, and a large workforce heightens the risk of theft, vandalism, or sabotage. Local tensions may flare if employment expectations are unmet or if grievances are not addressed. In Somalia's fragile security context, construction sites may also become targets of opportunistic crime or political violence, requiring robust security arrangements.

6.3.1.19. Climate Impacts (Greenhouse Gas Emissions)

Construction will contribute to greenhouse gas emissions through fuel combustion in vehicles and machinery, cement production, and long-distance transportation of materials. Vegetation clearance and replacement of permeable surfaces with concrete will further reduce natural carbon absorption and contribute to localized heating effects, undermining urban climate resilience.

6.3.1.20. Gender-Based Violence (GBV) and Sexual Exploitation, Abuse, and Harassment (SEAH)

The arrival of male-dominated construction teams into host communities increases the risk of sexual harassment, exploitation, or abuse of women and girls. Weak enforcement of codes of conduct and limited access to reporting mechanisms may exacerbate vulnerabilities. Such incidents can damage social trust, undermine community well-being, and erode project legitimacy.

6.3.1.21. Child Labour Risks

Poverty and weak enforcement of labor laws increase the risk of children being drawn into informal, hazardous roles at construction sites. These roles may include carrying loads, handling materials, or assisting adult workers. Child labor not only exposes minors to injury but also interrupts education and undermines long-term human development.

6.3.1.22. Public Health: HIV, STDs, and Waterborne Diseases

Interactions between incoming laborers and local communities may increase the prevalence of HIV and other sexually transmitted infections. Inadequate health services and limited access to preventive measures such as condoms amplify these risks. Furthermore, stagnant water, poor drainage, and inadequate sanitation facilities may lead to outbreaks of malaria, cholera, diarrhoea, and other communicable diseases, posing significant public health threats.

6.3.2. Construction Phase Impact Matrix

Impact	Magnitude	Duration	Reversibility	Scale	Avoidable?	Consequences / Costs & Benefits
Land take and resettlement (physical and economic displacement effects)	High	Long-term	Irreversible	Local	Partially	Direct displacement or loss of access to land/resources. Inadequate compensation can cause long-term poverty. Proper resettlement restores livelihoods and builds social acceptance.
Loss of vegetation (site-specific)	Low–Medium	Long-term	Irreversible	Local	Partially	Reduced biodiversity, ecosystem disturbance.
Air pollution (dust, diesel emissions)	Medium	Short-term	Reversible	Local	Partially	Respiratory issues, reduced air quality; manageable with suppression.
Noise & vibrations	High (near sensitive receptors)	Short-term	Reversible	Local	No	Annoyance, health stress, potential building damage.
Water & soil pollution (spills, runoff)	Medium	Short-term	Partially reversible	Local – Downstream	Partially	Contamination of surface/groundwater; cleanup costly.
Solid & liquid waste generation	High	Short–Medium	Partially reversible	Local	Partially	Health hazards if unmanaged; benefits if recycling.
Occupational health & safety risks	High	Continuous	Partially reversible	Local	No	Worker injuries, fatalities; high social and financial costs.
Community health & safety (traffic, dust, accidents)	Medium–High	Short–Medium	Reversible	Local	Partially	Increased accidents, mobility issues.
GBV/SEAH risks	Medium	Short–Medium	Reversible with safeguards	Local	Yes	Potential exploitation; prevention programs reduce risk.
HIV/AIDS and STDs	Medium	Medium–Long	Partially reversible	Local–Regional	Partially	Increased health burden; prevention yields public health benefits.

Impact	Magnitude	Duration	Reversibility	Scale	Avoidable?	Consequences / Costs & Benefits
Climate impact (GHG emissions)	Medium	Long-term	Irreversible	Regional/Global	No	Carbon footprint from machinery.

Table 7- 4: Construction Phase Impact Matrix

6.3.3. Construction Phase Risk Characterization

Impact	Severity	Extent	Duration	Reversibility	Likelihood	Overall Risk Rating
Land Take & Resettlement (actual displacement/restrictions)	High	Localized/Community-wide	Long-term	Irreversible	Moderate	High
Loss of Vegetation (site-specific)	Moderate	Localized	Long-term	Irreversible	Moderate	Moderate
Air Pollution (dust & diesel emissions)	Moderate	Localized	Short to Mid-term	Reversible	High	Moderate
Noise Pollution & Vibrations	High	Localized	Short to Mid-term	Reversible	High	High
Water Pollution (surface/groundwater)	High	Localized	Mid to Long-term	Partially Reversible	Moderate	High
Soil Pollution, Compaction & Loss	Moderate	Localized	Mid-term	Partially Reversible	Moderate	Moderate
Solid Waste Generation	High	Localized	Short to Mid-term	Partially Reversible	High	High
Liquid Waste Generation	High	Localized	Short to Mid-term	Partially Reversible	High	High
Occupational Health & Safety Hazards	High	Site-specific	Throughout Project	Partially Reversible	High	High
Community Health & Safety Risks	High	Community-wide	Short to Mid-term	Partially Reversible	High	High
Population Influx & Socio-cultural Disruption	Moderate	Localized	Project Duration	Reversible	Moderate	Moderate
Gender-Based Violence (GBV/SEAH)	High	Localized	Short to Mid-term	Partially Reversible	Moderate	High
HIV & STDs Risk	High	Localized	Short to Mid-term	Partially Reversible	Moderate	High

Impact	Severity	Extent	Duration	Reversibility	Likelihood	Overall Risk Rating
Climate Impact (GHG emissions)	Moderate	Regional/Global	Long-term	Irreversible	High	High
Security Risks	High	Project-wide	Project Duration	Variable	Moderate	High
Child Labour Risk	High	Localized	Project Duration	Reversible	Moderate	High

Table 7- 5: Construction Phase Risk Characterization

6.3.4. Impacts During Operation Phase

The operational phase will deliver long-term socio-economic benefits but also introduces sustainability considerations.

6.3.4.1. Positive Impacts

- Improved taxpayer services through modern infrastructure.
- Strengthened fiscal governance and accountability.
- Job creation (permanent staff positions).
- Enhanced revenue mobilization, reducing aid dependency.

6.3.4.2. Negative Impacts

- Increased solid waste and wastewater generation.
- Energy and water demand pressures.
- Traffic congestion around offices.
- Risk of exclusion of VMGs if facilities are not accessible.

6.3.4.3. Air Quality Impacts

The operation of the offices will attract increased vehicular traffic from staff, service providers, and clients. Exhaust emissions containing nitrogen oxides, carbon monoxide, and particulate matter will degrade local air quality, particularly in congested urban settings. Frequent useof standby diesel generators, due to unreliable power supply, will further contribute to air pollution and greenhouse gas emissions. Prolonged exposure may cause respiratory and cardiovascular issues for staff and nearby residents.

6.3.4.4. Noise Pollution

Continuous operation of generators, HVAC systems, and increased vehicular movement will generate noise within and around the facilities. Although less intense than construction noise, persistent low-level noise may cause discomfort to staff and disturbance to neighboring communities, especially in quieter residential or institutional surroundings.

6.3.4.5. Solid Waste Generation

Daily operations will generate a steady stream of solid waste, including paper, plastics, food waste, packaging, and obsolete office equipment. Without effective waste segregation, recycling, and disposal mechanisms, waste could accumulate around the premises, attract pests, and create unsanitary conditions. Improper disposal of electronic waste (computers, batteries, printers) may release toxic substances, polluting soil and water resources.

6.3.4.6. Liquid Waste and Sanitation Impacts

Restrooms, kitchens, and cleaning services will produce greywater and sewage. In towns with inadequate sewerage infrastructure, untreated effluents may infiltrate soils or flow into open drains,

contaminating water sources. This poses risks of waterborne diseases for workers and nearby communities, especially in areas relying on shallow wells or boreholes.

6.3.4.7. Increased Water Demand and Resource Stress

Operational activities will increase demand for water for sanitation, cleaning, and staff use. In water-scarce regions, heavy reliance on groundwater or water trucking may exacerbate resource depletion and lead to competition with community needs. Poor management could worsen local water scarcity.

6.3.4.8. High Energy Consumption and Carbon Footprint

The facilities will require continuous energy to power lighting, ICT equipment, elevators, and cooling systems. Dependence on diesel generators will significantly raise the carbon footprint, contributing to greenhouse gas emissions. This reliance also increases operational costs and vulnerability to fuel shortages.

6.3.4.9. Traffic Congestion and Road Safety Risks

Daily staff commuting, visitors, service deliveries, and official government functions will increase traffic around the facilities. In towns with limited road infrastructure, this may result in congestion, longer travel times, increased emissions, and higher risks of road accidents involving vehicles and pedestrians.

6.3.4.10. Occupational Health and Safety Risks

Office environments expose staff to risks such as poor indoor air quality, ergonomic hazards (poor seating or workstation arrangements), electrical faults, and fire outbreaks. Without adequate maintenance and safety protocols, employees may face chronic illnesses, accidents, or reduced productivity.

6.3.4.11. Community Health and Safety Risks

Communities near the facilities may face exposure to generator emissions, increased traffic accidents, and potential hazards from poorly managed waste. Inadequate security or crowd control measures may also increase risks during peak operational periods.

6.3.4.12. Fire and Electrical Safety Risks

The concentration of ICT equipment, wiring, and document storage increases the risk of electrical faults and fire incidents. Without robust detection, suppression systems, and emergency preparedness, such hazards could result in injuries, fatalities, and loss of critical government infrastructure.

6.3.4.13. Visual and Aesthetic Impacts

If waste is not properly managed and landscaping neglected, the facilities could reduce local aesthetic quality. Over time, unmaintained buildings may create a negative visual impression, undermining their role as symbols of governance and service delivery.

6.3.4.14. Public Health Risks (HIV/AIDS, Waterborne Diseases)

Interaction of staff, clients, and service providers may create pathways for communicable diseases, including HIV and other STDs. Additionally, poorly managed wastewater could spread waterborne diseases such as cholera and typhoid within host communities.

6.3.4.15. Social Inequality in Access

If the facilities are not designed with inclusivity in mind, vulnerable groups such as persons with disabilities, women, and the elderly may experience difficulties in accessing services. Exclusion from public services reinforces social inequality and reduces the building's utility to all citizens.

6.3.4.16. Security Risks

As government facilities, the revenue offices may attract demonstrations, vandalism, or even targeted attacks. Security measures such as fencing, surveillance, and restricted access may be necessary but could also strain relations with surrounding communities if not carefully managed.

6.3.4.17. Gender-Based Violence (GBV) and Sexual Exploitation, Abuse, and Harassment (SEAH)

Crowding, service delivery pressures, and staff-client interactions could create opportunities for exploitation or harassment, particularly for women, adolescents, and vulnerable groups. Inadequate grievance redress or accountability systems could allow such risks to persist.

6.3.5. Operation Phase Impact Matrix

Impact	Magnitude	Duration	Reversibility	Scale	Avoidable ?	Consequences / Costs & Benefits
Air emissions from traffic & generators	Medium	Long-term	Partially reversible	Local–Regional	Partially	Chronic air quality deterioration; can be mitigated by hybrid/solar energy.
Noise (generators, HVAC, traffic)	Low–Medium	Continuous	Reversible	Local	Yes	Minor nuisance; manageable with technology.
Solid & e-waste generation	Medium	Continuous	Partially reversible	Local–Regional	Partially	Risk of pollution if unmanaged; recycling creates green jobs.
Liquid waste & sanitation	Medium	Continuous	Partially reversible	Local	Partially	Water contamination, disease risk; proper sewerage improves public health.
Increased water demand	Medium	Long-term	Irreversible if over-extracted	Local	Partially	May strain scarce water; efficiency systems reduce cost.
Energy consumption	Medium–High	Long-term	Partially reversible	Local–Regional	Partially	High operational costs, carbon footprint; renewable integration reduces costs.
Traffic congestion & safety	Medium	Continuous	Reversible	Local	Partially	Increased accidents, delays; mitigated with traffic management.
Occupational health & safety	Medium	Continuous	Reversible	Local	Partially	Indoor air issues, ergonomic risks; mitigated with OHS measures.
Community health & safety	Medium	Continuous	Reversible	Local	Partially	Noise, air quality, traffic affect community; improved services benefit economy.
Fire/electrical safety	Medium–High	Long-term (episodic)	Irreversible (if accidents occur)	Local	Partially	Risk of loss of life/property; mitigated with robust systems.
Social exclusion (PWDs, elderly)	Medium	Long-term	Reversible	Local	Yes	Lack of accessibility undermines social equity; inclusive design improves access.
GBV/SEAH risks in service delivery	Low–Medium	Continuous	Reversible with safeguards	Local	Yes	Harassment undermines trust; grievance systems build accountability.

Table 7- 6: Operation Phase Impact Matrix

6.3.6. Operation Phase Risk Characterization

Impact	Severity	Extent	Duration	Reversibility	Likelihood	Overall Risk Rating
Increased Solid Waste from Offices	Moderate	Localized	Long-term	Partially Reversible	High	Moderate
Increased Wastewater/Sanitation Loads	Moderate	Localized	Long-term	Partially Reversible	High	Moderate
Noise from Office Operations (traffic, gensets)	Low–Moderate	Localized	Long-term	Reversible	High	Moderate
Traffic Congestion & Road Wear	Moderate	Community-wide	Long-term	Reversible	Moderate	Moderate
Utility Demand (water, electricity)	Moderate	Community-wide	Long-term	Reversible	High	Moderate
Occupational Health & Safety Risks (staff)	Moderate	Site-specific	Continuous	Reversible	Moderate	Moderate
Community Health & Safety (public users)	Moderate	Localized	Long-term	Partially Reversible	Moderate	Moderate
Security Risks (public facility, cash handling)	High	Project-wide	Continuous	Variable	High	High
Public Health Risks (sanitation, HIV awareness gaps)	Moderate	Localized	Long-term	Partially Reversible	Moderate	Moderate
Gender-Based Violence/Harassment Risks	Moderate	Localized	Long-term	Partially Reversible	Low–Moderate	Moderate
Climate Impact (energy use, emissions)	Low–Moderate	Regional	Long-term	Irreversible	Moderate	Moderate

Table 7- 7: Operation Phase Risk Characterization

6.3.7. Decommissioning Phase Impacts

6.3.7.1. Demolition Waste Generation

Decommissioning will generate large volumes of solid waste, including concrete rubble, steel, glass, wood, plastic, and packaging materials. If not properly managed, this waste can overwhelm local disposal facilities, contribute to illegal dumping, and degrade soil and water quality. Hazardous waste such as asbestos, paints, solvents, or electronic components (from office infrastructure) may also be generated, requiring specialized handling.

6.3.7.2. Air Quality Impacts (Dust and Emissions)

Demolition and debris handling will release high levels of dust and particulate matter into the air, reducing local air quality. In addition, the use of heavy machinery and trucks will emit greenhouse gases and other pollutants, contributing to localized air pollution and climate change impacts.

6.3.7.3. Noise and Vibrations

Demolition activities, including concrete breaking, metal cutting, and truck operations, will produce excessive noise and vibrations. These disturbances may affect workers and surrounding communities, with potential risks of structural damage to adjacent buildings in densely built-up areas like Baidoa.

6.3.7.4. Soil and Water Pollution

Improper disposal of demolition waste, leakage of fuels, oils, or chemicals from machinery, and runoff carrying debris or fine sediments can contaminate soils and nearby water sources. This may threaten community wells, boreholes, or urban drainage systems.

6.3.7.5. Traffic Disruptions and Road Safety Risks

The transport of demolition waste using heavy trucks will increase traffic congestion and accident risks, particularly in community-centered sites such as Baidoa. Road surfaces may also deteriorate faster under increased heavy vehicle loads.

6.3.7.6. Occupational Health and Safety Risks

Workers engaged in demolition face elevated risks from falling debris, dust inhalation, noise exposure, and accidents involving heavy machinery. Inadequate protective equipment or poor enforcement of safety protocols could result in serious injuries or fatalities.

6.3.7.7. Community Health and Safety Risks

Communities around the sites may be exposed to airborne dust, hazardous materials, unsafe access to demolition areas, and traffic-related hazards. In addition, vibrations and noise may disrupt daily life and increase stress levels among nearby residents.

6.3.7.8. Loss of Infrastructure and Services

Decommissioning will eliminate the revenue collection offices, temporarily disrupting service delivery for tax collection and financial administration. This could negatively impact public access to government services until alternative facilities are provided.

6.3.7.9. Visual and Aesthetic Impacts

Demolition activities will leave behind unsightly rubble, open excavated areas, and construction debris, reducing the aesthetic value of the site and surrounding environment until proper rehabilitation or redevelopment occurs.

6.3.7.10. Socio-Economic Impacts

Loss of jobs for staff employed in the offices and for support services (cleaning, security, maintenance) may occur. Local businesses that relied on office staff as customers could also be affected. However, short-term jobs may be created during demolition and site rehabilitation

6.3.8. Decommissioning Phase Impact Matrix

Impact	Magnitude	Duration	Reversibility	Scale	Avoidable?	Consequences / Costs & Benefits
Demolition waste generation	High	Short–Medium	Partially reversible	Local	Partially	Large volumes of debris; recycling reduces burden and creates benefits.
Air & noise pollution (demolition works)	Medium–High	Short-term	Reversible	Local	Partially	Nuisance and health risks; manageable with dust suppression & PPE.
Soil & water contamination (hazardous waste, spills)	Medium	Short-term	Partially reversible	Local – Downstream	Partially	Risk of toxins leaching into soils/water; costly remediation if unmanaged.
Traffic impacts (heavy trucks removing waste)	Medium	Short-term	Reversible	Local	Partially	Congestion, road wear, safety issues; mitigated with planning.
Occupational safety risks	High	Continuous (until completed)	Partially reversible	Local	No	High accident risk during demolition; requires strict OHS enforcement.
Community health & safety	Medium	Short-term	Reversible	Local	Partially	Dust, debris, traffic accidents; mitigated with barriers & community awareness.
Visual impacts	Medium	Short–Medium	Reversible (post-site rehab)	Local	Yes	Eyesore during demolition; site restoration improves aesthetics.
Climate impacts (emissions from machinery, debris transport)	Medium	Short-term	Irreversible	Regional / Global	No	Contribution to GHG emissions; mitigated by efficient practices.

Table 7- 8: Decommissioning Phase Impact Matrix

6.3.9. Decommissioning Phase Risk Characterization

Impact	Severity	Extent	Duration	Reversibility	Likelihood	Overall Risk Rating
Demolition Waste (hazardous & non-hazardous)	High	Localized	Short-term	Partially Reversible	High	High
Air Pollution (dust, emissions)	Moderate	Localized	Short-term	Reversible	High	Moderate
Noise & Vibrations from Demolition	High	Localized	Short-term	Reversible	High	High
Soil & Water Contamination (spills, debris)	Moderate	Localized	Short to Mid-term	Partially Reversible	Moderate	Moderate
Occupational Health & Safety Hazards	High	Site-specific	Project Duration	Reversible	High	High
Community Health & Safety Risks (exposure to demolition hazards)	High	Community-wide	Short-term	Partially Reversible	Moderate	High
Loss of Employment/Services (post-closure)	Moderate	Community-wide	Long-term	Irreversible	Moderate	Moderate
Visual & Aesthetic Impacts (derelict site if not restored)	Moderate	Localized	Medium-term	Reversible with rehabilitation	Moderate	Moderate

Table 7- 9: Decommissioning Phase Risk Characterization

6.3.10. Cumulative and Indirect Impacts

In addition to site-specific impacts, the proposed construction of revenue collection offices in Dhuusamareb, Jowhar, Kismayo, Bossaso, and Baidoa may collectively generate cumulative and indirect environmental and social impacts. These arise from the combined effect of multiple offices being constructed simultaneously and from the secondary socio-economic changes induced by their operation.

6.3.10.1. Key Dimensions of Cumulative and Indirect Impacts

1. **Urban Service Pressure**
   - Simultaneous construction activities in multiple towns may overburden municipal services, including solid waste collection, drainage, and local road networks.
   - Indirectly, this may increase illegal dumping of construction debris or overuse of unpaved roads, worsening dust and erosion.

2. **Secondary Economic Activity and Land Use Change**
   - The operation of new offices is expected to attract small businesses (food vendors, shops, transport providers).
   - This economic clustering may create positive employment opportunities but also generate additional waste, water demand, and informal land occupation near the offices.

3. **Cumulative Traffic Congestion**
   - The establishment of government hubs in central areas will likely increase vehicular and pedestrian traffic, particularly during peak working hours.
   - Without traffic management planning, this may lead to congestion, safety risks (especially for school children and elderly pedestrians), and higher emissions

4. **Social Cohesion and Governance Effects**
   - Indirectly, the new offices will enhance visibility and presence of state authority in urban centers, contributing to governance legitimacy.
   - However, if not inclusive, there may be perceptions of marginalization among communities excluded from employment or procurement opportunities

5. **Social Cohesion and Governance Effects**
   - Indirectly, the new offices will enhance visibility and presence of state authority in urban centers, contributing to governance legitimacy.
   - However, if not inclusive, there may be perceptions of marginalization among communities excluded from employment or procurement opportunities

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6.3.11. Cumulative and Indirect Impact Matrix

Impact Area	Magnitude	Duration	Reversibility	Scale	Likelihood	Risk/Benefit Rating
Urban service pressure (waste, drainage, roads)	Medium	Medium-term	Reversible with municipal action	Municipal/Regional	Likely	Moderate Risk
Secondary economic activity (informal businesses, land use change)	High	Long-term	Partially reversible	Local/Regional	Very Likely	High Benefit / Moderate Risk
Cumulative traffic congestion & safety risks	Medium	Long-term	Reversible with mitigation	Municipal	Likely	Moderate Risk
Governance strengthening & state legitimacy	High	Long-term	Irreversible (beneficial)	National/Regional	Likely	Very High Benefit
Perceived exclusion of VMGs from benefits	Medium	Medium-term	Reversible with inclusive policies	Local	Possible	Moderate Risk

Table 7- 10: Cumulative and Indirect Impact Matrix

7. ANALYSIS OF ALTERNATIVES

This chapter provides a comprehensive analysis of the project alternatives and the criteria used to guide the selection of the preferred option. It evaluates the proposed development in terms of key parameters, including site selection, design options, technology choices, construction techniques and phasing, as well as the anticipated environmental and social impacts across each alternative. The alternatives considered are assessed not only on their ability to meet the project's functional and economic objectives but also on their performance in minimizing adverse environmental and social effects. The evaluation framework incorporates sustainability principles, technical feasibility, cost-effectiveness, risk exposure, and compliance with relevant legal and institutional requirements.

7.1. No-Project Scenario

The "No-Project" alternative assumes that the proposed construction of new revenue offices in Dhuusamareb, Kismayo, Jowhar, and Baidoa will not proceed. This option would avoid temporary environmental impacts such as dust, noise, vegetation loss, construction waste generation and traffic disruptions during the construction phase. However, the disadvantages of this scenario are significant. Local revenue collection would remain dependent on inadequate, outdated, or scattered facilities, limiting transparency, accountability, and efficiency. This would hinder state governments' ability to mobilize domestic revenues effectively, thus constraining service delivery and undermining fiscal decentralization. The socio-economic opportunity for local jobs during construction and operation would also be lost. In the long term, the absence of adequate offices could exacerbate inefficiency, increase administrative costs, and create public dissatisfaction. For these reasons, the No-Project alternative is not viable as it undermines both governance and economic development goals.

Conclusion: While avoiding short-term disruptions, this option fails to address long-term administrative efficiency and service delivery needs and is therefore not recommended.

7.2. Siting Alternatives

7.2.1. Dhuusamareb

In Dhuusamareb, three siting alternatives were reviewed. The first was to maintain the currently rented revenue offices, which allowed service continuity but presented long-term challenges such as limited space, inadequate security and recurring rental costs. The second option was a central commercial site near the market, which offered visibility but posed risks of business displacement and potential tenure disputes. The third and ultimately selected option was a fenced government-owned parcel within an institutional precinct, which required no acquisition, minimized resettlement risks, provided secure boundaries and supported synergies with other government institutions.

7.2.2. Kismayo

In Kismayo, three options were considered. The first was to retain the currently rented revenue offices, which avoided relocation costs but proved unsustainable due to high recurrent expenses, limited space, and poor security. The second alternative was a privately-owned plot in a busy commercial corridor, which would have enhanced public visibility but came with high land costs and legal risks. The third and selected option was a fenced government compound within the Ministry of Finance compound, which was immediately available, provided secure boundaries, and fostered institutional synergies between the Ministry and the revenue authority. This combination of security, availability, and administrative integration made it the most viable and sustainable choice.

7.2.3. Jowhar

In Jowhar, three alternatives were assessed. The first was to maintain the current small shared office within the Ministry of Finance, which allowed operations to continue but offered very limited space and unsuitable working conditions for a growing institution. The second option was a central market-adjacent plot, which was accessible but carried high risks of land disputes, congestion, and disruption of commercial activity. The third and selected option was a fenced government-owned parcel within the Ministry of Finance compound, which ensured security, consolidation of functions, and close institutional coordination between the Ministry and the revenue authority, while also providing space for future expansion.

7.2.4. Baidoa

In Baidoa, three siting alternatives were examined. The first was to continue operating from the currently rented revenue office, which enabled continuity of services but resulted in long-term financial outflows while offering inadequate space and poor security. The second option was a government plot within the Ministry compound near the State House, which offered strong security and institutional proximity but limited accessibility for the public, undermining the service delivery mandate of the revenue office. The third and preferred option was an accessible government parcel within the town, which ensured ease of access for taxpayers and businesses while requiring only modest investment in fencing and security infrastructure.

7.3. Design Alternatives

Two main design options were considered for the proposed revenue offices. The first was to construct single-storey buildings for each site. This option would have been simpler to design and build, with faster completion times and easier accessibility. However, it required larger land footprints, which is impractical within the fenced and often space-constrained government compounds. Single-storey structures also limit future expansion capacity, meaning additional land or new buildings would be required to accommodate institutional growth.

The second option, and the one selected, was to develop compact two-storey buildings. This design makes more efficient use of the available land, provides sufficient office space for current and future needs, and allows functional separation of departments across floors. Although slightly more complex to construct, the two-storey option balances cost, security, and long-term operational efficiency, making it the most practical and sustainable choice for the revenue offices.

7.4. Construction Techniques and Phasing Alternatives

Two main construction techniques were reviewed. The first option was the use of conventional cast in-situ reinforced concrete, which is widely available, cost-effective, and suitable for the local context, though it requires longer curing times and more intensive site management. The second alternative was prefabricated structural elements, which could shorten construction time and improve quality control but would require specialized equipment and higher upfront costs. Given material availability and contractor experience in the project areas, conventional cast in-situ concrete was identified as the most practical and cost-effective technique.

Regarding construction sequencing, two options were considered: (i) phased construction, which would allow partial site use during works, and (ii) full construction after complete site clearance. Phased construction would extend project timelines and pose safety risks to workers and the public. The preferred approach is full construction on cleared sites, since the projects involve new buildings rather than rehabilitation of existing offices. This method ensures efficiency, safety, and quality control without disrupting revenue collection services.

7.5. Operation and Maintenance Alternatives

For building operation and maintenance, two approaches were evaluated. The first option was a reactive maintenance model, where repairs are carried out only when defects or failures occur. While this approach requires lower upfront investment, it often results in higher long-term costs, reduced service life of components, and frequent service disruptions. The second option was a planned preventive maintenance model, where regular inspections, servicing, and timely replacement of building components such as roofing, plumbing, electrical systems, and finishes are undertaken. Though this approach requires more structured planning and budget allocation, it ensures greater durability, reduced lifecycle costs, and improved safety and comfort for staff and service users. The preferred approach is preventive maintenance, as it supports sustainability, efficiency, and reliable service delivery.

7.6. Waste Management Alternatives

Two main alternatives were considered for managing waste generated during the construction and operational phases of the revenue office buildings.

Option A: Conventional Disposal

This approach would involve collecting all construction waste and transporting it directly to municipal dumpsites without prior segregation. It is simple to implement and requires minimal planning. However, it is environmentally unsustainable, as it contributes to the overloading of dumpsites, accelerates land degradation, and results in the loss of recyclable and reusable materials. It also increases the risk of improper disposal of hazardous waste (e.g., paints, solvents, oils), which could contaminate soil and water resources. Over the long term, conventional disposal places a burden on municipal authorities and undermines environmental sustainability goals.

Option B: Integrated Waste Management (Selected)

The preferred approach is an integrated waste management plan that prioritizes reduction at source, segregation of waste streams, reuse and recycling, and responsible disposal of residual and hazardous materials. Under this model, construction waste such as concrete debris, wood, and packaging materials will be sorted on-site. Salvageable aggregates will be reused in backfilling or secondary construction works, while scrap metals and plastics will be sold or delivered to local recycling enterprises. Hazardous wastes including paints, solvents, and oil residues will be stored safely in labelled containers and transported to designated hazardous waste facilities for treatment and disposal in compliance with national regulations. Organic waste generated during site operations (e.g., from staff facilities) will be managed through composting or directed to municipal solid waste systems.

7.7. Energy Alternatives

Two alternatives were examined: (i) reliance solely on the national grid supplemented by diesel generators, and (ii) a hybrid system integrating grid power with solar PV. The grid-only option risks frequent disruptions and dependence on costly diesel backup. The hybrid system ensures reliability, reduces operating costs, and lowers carbon emissions. Given Somalia's high solar potential, the hybrid system was selected as the preferred option.

7.8. Technology Alternatives

Construction technology options considered were conventional reinforced concrete versus prefabricated modular systems. Prefabricated systems could reduce construction time and site waste but are not widely available locally, making them costly and logistically difficult. Reinforced concrete, though associated with higher embodied carbon, is widely understood by local contractors, cost-effective, durable, and provides job opportunities for local masons and laborers. It was therefore selected.

7.9. Overall Conclusion

Across all project towns, the alternatives analysis demonstrates that the selected approaches strike a balance between functionality, cost-effectiveness, sustainability, and social responsibility. Government-owned parcels mostly within Ministry of Finance compounds were chosen over rented premises or private/commercial plots, as they minimize land acquisition risks, strengthen institutional synergies, and provide secure boundaries while ensuring public accessibility. The design choice of compact two-storey buildings was preferred over single-storey layouts, as it optimizes limited land availability and allows for future growth without excessive expansion costs.

For construction, conventional cast-in-situ concrete combined with full site clearance was selected as the most practical and safe method, avoiding the risks and inefficiencies of phased works. In terms of operations and maintenance, a preventive model was chosen over reactive repairs to extend building life, reduce costs, and ensure reliable service delivery. Waste management will follow an integrated approach emphasizing reduction, segregation, recycling, and safe disposal, in contrast to conventional dumping, thereby reducing environmental impacts and creating local economic opportunities.

8. MITIGATION MEASURES FOR POTENTIAL IMPACTS

This chapter presents the proposed mitigation measures to address potential negative environmental and social impacts and to enhance the positive outcomes associated with the construction and operation of the new Revenue Collection Offices in Baidoa, Dhuusamareb, Kismayo, and Jowhar. The measures provide practical, site-specific actions aimed at preventing, reducing, or offsetting adverse impacts on air quality, water and soil resources, biodiversity, public health, occupational safety, and the socio-economic wellbeing of local communities.

The chapter also outlines strategies to maximize the project's positive contributions, including local employment generation, institutional strengthening, improved accessibility of public services, and the creation of durable infrastructure that supports transparent revenue management.

All proposed measures are aligned with Somali national environmental and building regulations, as well as applicable international safeguard standards. They are also informed by stakeholder consultations carried out at each project site, ensuring that the project is implemented in a socially inclusive, environmentally sound, and economically sustainable manner.

8.1. Positive Impact Maximization Strategies

This section outlines strategies to enhance the positive environmental, social, and economic outcomes of constructing and operating the new Revenue Collection Offices in Baidoa, Dhuusamareb, Kismayo, and Jowhar. The focus is on ensuring that the project delivers long-term community and institutional benefits beyond its primary function of revenue administration.

Key strategies include promoting local employment and skills development by prioritizing the hiring of local labor and contractors wherever feasible and providing on-site training opportunities to enhance technical capacity. The project will also strengthen service delivery by consolidating revenue functions within modern, accessible, and secure facilities, thereby improving efficiency, transparency, and public trust in financial management.

The development will contribute to urban infrastructure enhancement through the installation of durable utilities, improved landscaping, and integration of accessibility features that set a standard for other public facilities. At the institutional level, co-location of revenue offices with the Ministry of Finance compounds in several towns will foster synergies in financial governance and administrative coordination.

By embedding these strategies into project planning, construction, and operation, the Revenue Collection Offices will not only address identified challenges but also deliver sustainable benefits, supporting economic growth, institutional strengthening, and community development across the project areas.

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8.2. Positive Impact Enhancement Strategy

Positive Impact Category	Specific Positive Impact	Enhancement Measures	Responsible Party	Monitoring Indicator
Employment & Economic Benefits	Direct job creation (construction & operations)	- Prioritize local hiring- Ensure gender/youth inclusion- Provide fair contracts & conditions	Contractor, PIU	% of local hires; Gender/youth ratios
	Indirect employment & SME growth	- Source materials/services from local SMEs- Organize supplier/vendor fairs- Offer capacity-building to local businesses	PIU, Contractor, Procurement Unit	No. of SMEs engaged; Value of local procurement
	Local economy stimulation	- Encourage use of local supply chains- Facilitate community vendor access during construction/operation	Contractor, PIU	Records of local spending; Community vendor feedback
Institutional & Governance Strengthening	Improved revenue collection efficiency	- Equip offices with ICT systems- Digitize records & processes- Integrate taxpayer services	PIU, MoF Revenue Dept., ICT Unit	System uptime reports; Reduced processing time
	Transparency & accountability	- Deploy e-payment systems- Train staff on accountability tools- Improve archiving & audit systems	PIU, Revenue Authority, ICT Unit	Audit compliance rate; Digital transaction reports
Urban & Environmental Sustainability	Green building practices	- Use eco-friendly materials- Incorporate solar power & natural lighting- Install energy-efficient systems	Contractor, PIU, Architect	Energy audits; Sustainability certification
	Waste & water management	- Provide solid waste segregation bins- Ensure efficient plumbing systems- Develop O&M protocols	Contractor, Facility Manager, PIU	Waste tracking logs; Water consumption trends
	Urban aesthetics & renewal	- Replace old/dilapidated offices- Landscape with indigenous trees- Improve fencing and public surroundings	Contractor, PIU, Local Authorities	Site inspections; Beautification outcomes
Social & Community Benefits	Improved taxpayer services	- Provide waiting lounges with climate control- Install ramps, signage & lifts for accessibility- Ensure digital service kiosks	PIU, Architect, MoF HR	Accessibility audits; Taxpayer satisfaction surveys

Positive Impact Category	Specific Positive Impact	Enhancement Measures	Responsible Party	Monitoring Indicator
	Community pride & civic symbolism	- Use national/state symbols in design- Publicly launch & promote new offices- Highlight role in service delivery	PIU, MoF PR, Local Authorities	Community engagement reports; Media coverage
	Gender & youth empowerment	- Recruit women & youth in operations- Link youth to internships/apprenticeships- Apply workplace gender policies	Contractor, PIU, HR Unit	% female/youth employees; Inclusion records
Long-Term Strategic Benefits	Fiscal sustainability	- Strengthen revenue systems- Establish automated reporting tools- Build staff capacity in modern PFM	MoF Revenue Dept., PIU, ICT Unit	Growth in local revenue collection; System efficiency metrics
	Climate & security resilience	- Incorporate resilient design standards- Install CCTV & secure access points- Conduct safety & fire drills	Contractor, MoF Security, PIU	Security readiness reports; Fire drill logs
Infrastructure Development	Upgraded local infrastructure	- Improve access roads, drainage & street lighting- Coordinate with utilities (ICT, water, electricity)	PIU, Ministry of Public Works, Local Authority	No. of upgraded assets; Utility access records
	Integration with local planning	- Align office locations with city/town plans- Ensure connectivity to transport hubs & government facilities	PIU, MoF Planning Dept., Urban Authority	Urban integration reports; Connectivity maps

Table 9- 1: Positive Impact Enhancement Strategy

8.3. Negative Impact Mitigation Measures

This section presents the proposed measures to prevent, minimize, or manage the potential negative environmental and social impacts associated with the construction and operational phases of the Revenue Collection Offices. The mitigation strategies focus on addressing site-specific risks such as air and water pollution, noise and vibration, soil disturbance, waste generation, occupational and community health and safety, traffic disruption, and security concerns.

The measures are aligned with national environmental regulations, IFC Performance Standards, and international best practices to ensure compliance and sustainability. They are tailored to the unique environmental and socio-economic conditions of Baidoa, Dhuusamareb, Jowhar, and Kismayo to promote responsible project delivery and safe long-term operations.

8.3.1. Pre-Construction Impact Mitigation Measures

Negative Impact	Risk Characterization	Risk Rating	Mitigation Measures
Land acquisition & resettlement	High severity, localized, long-term, irreversible	High	Prepare & implement Resettlement Action Plan (RAP), fair compensation, livelihood restoration, continuous community engagement.
Social conflict over land ownership	Moderate severity, localized, project duration, reversible	Moderate	Transparent land acquisition process, grievance redress mechanism (GRM), involve local leaders.
Loss of vegetation & habitat	Moderate severity, localized, long-term, partially reversible	Moderate	Site selection to avoid sensitive zones, compensatory tree planting, greening programs.
Displacement of vulnerable groups	High severity, localized, long-term, partially reversible	High	Special assistance to vulnerable groups (elderly, women, children, PWDs), relocation support, community inclusion.
Stakeholder grievances	Moderate severity, localized, short-term, reversible	Moderate	Establish GRM, hold pre-project consultations, provide information disclosure mechanisms.

Table 9- 2: Pre-Construction Impact Mitigation Measures

8.3.2. Construction Phase Impact Mitigation Measures

Negative Impact	Risk Characterization	Risk Rating	Mitigation Measures
Noise & vibration	High severity, localized, short-term, reversible	High	Restrict construction hours, noise barriers, PPE for workers.
Dust & air pollution	Moderate severity, localized, short-term, reversible	Moderate	Dust suppression by water spraying, cover trucks, equipment maintenance.
Soil erosion, compaction & contamination	Moderate severity, localized, mid-term, partially reversible	Moderate	Proper drainage, erosion control, spill prevention, secure fuel storage.
Water pollution (surface & groundwater)	High severity, localized, mid-term, partially reversible	High	No discharge of untreated waste, silt traps, portable toilets, wastewater treatment.
Solid waste generation	High severity, localized, short to mid-term, partially reversible	High	Segregation, recycling, disposal at licensed sites.
Liquid waste generation	High severity, localized, short to mid-term, partially reversible	High	Wastewater collection, treatment before discharge, monitoring.
Occupational health & safety hazards	High severity, site-specific, throughout project, reversible	High	PPE, worker training, site supervision, emergency response systems.
Community health & safety risks	High severity, community-wide, short to mid-term, partially reversible	High	Traffic control, signage, fencing of work areas, awareness campaigns.
Gender-based violence (GBV), SEA/SH, HIV/STIs	High severity, localized, project duration, partially reversible	High	Worker Code of Conduct, awareness training, contractor policies, monitoring, collaboration with NGOs.
Child labour	High severity, localized, project duration, reversible	High	Strict prohibition of child labour in contracts, routine inspections, penalties for violations.
Population influx & socio-cultural disruption	Moderate severity, localized, project duration, reversible	Moderate	Local hiring priority, awareness campaigns, grievance mechanisms.
Security risks (crime, theft, conflict)	High severity, project-wide, project duration, variable	High	Security management plan, coordination with authorities, lighting and fencing.

Negative Impact	Risk Characterization	Risk Rating	Mitigation Measures
Pressure on urban utilities & infrastructure	Moderate severity, community-wide, short-term, reversible	Moderate	Engage service providers, temporary utility arrangements, conservation measures.
Climate change contribution (GHG emissions from machinery, materials transport)	Moderate severity, regional/global, long-term, irreversible	High	Use low-emission equipment, reduce fuel use, source materials locally, adopt renewable energy where possible.

Table 9- 3: Construction Phase Impact Mitigation Measures

8.3.3. Operation Phase Impact Mitigation Measures

Negative Impact	Risk Characterization	Risk Rating	Mitigation Measures
Air emissions & GHG emissions	Moderate severity, regional/global, long-term, irreversible	High	Use energy-efficient equipment, adopt renewable energy, carbon offsetting.
Noise from operations	Moderate severity, localized, short-term, reversible	Moderate	Soundproofing, regular maintenance, restricted noisy operations.
Solid waste generation	High severity, localized, short-term, partially reversible	High	Waste segregation, recycling, licensed disposal services.
Liquid waste generation	High severity, localized, short-term, partially reversible	High	Proper wastewater treatment, regular monitoring, avoid illegal discharges.
Water demand & pressure on utilities	Moderate severity, community-wide, long-term, reversible	Moderate	Water-saving devices, rainwater harvesting, leak detection.
Traffic congestion & safety risks	Moderate severity, community-wide, project duration, reversible	Moderate	Traffic management plan, signage, parking areas, transport scheduling.
Community health & safety risks (accidents, HIV/STIs)	High severity, localized, short to mid-term, partially reversible	High	Awareness campaigns, road safety measures, linkages with local health facilities.
Occupational health & safety hazards	High severity, site-specific, throughout project, reversible	High	Enforce workplace safety policies, PPE, regular health & safety audits.
Climate change contribution (energy consumption, long-term emissions)	Moderate severity, regional/global, long-term, irreversible	High	Improve energy efficiency, promote paperless/digital operations, integrate renewable power.
Security risks (vandalism, terrorism)	High severity, project-wide, project duration, variable	High	Security protocols, surveillance, coordination with law enforcement.

Table 9- 4: Operation Phase Impact Mitigation Measures

8.3.4. Decommission Phase Impact Mitigation Measures

Negative Impact	Risk Characterization	Risk Rating	Mitigation Measures
Solid waste from demolition	High severity, localized, short-term, partially reversible	High	Reuse & recycle demolition materials, safe disposal at licensed facilities.
Dust & air pollution from demolition	Moderate severity, localized, short-term, reversible	Moderate	Dust suppression, controlled demolition, PPE for workers.
Noise & vibration	Moderate severity, localized, short-term, reversible	Moderate	Limit demolition to daytime, noise barriers, worker protection.
Soil & water contamination from debris	Moderate severity, localized, short-term, partially reversible	Moderate	Safe storage/transport of debris, hazardous waste management, soil remediation.
Occupational health & safety hazards	High severity, site-specific, project duration, reversible	High	Worker safety training, PPE, emergency preparedness.
Loss of employment (social impact)	Moderate severity, community-wide, short-term, reversible	Moderate	Transition support, link workers to other projects, vocational training.
Land instability & visual impacts (abandoned site)	Moderate severity, localized, mid-term, reversible	Moderate	Site rehabilitation, landscaping, community repurposing (parks, markets).
Community health & safety risks	High severity, localized, short to mid-term, partially reversible	High	Secure site, prevent unauthorized access, continuous monitoring until rehabilitation complete.
Climate change contribution (GHG from demolition equipment & debris transport)	Moderate severity, regional/global, short-term, irreversible	Moderate	Use low-emission demolition equipment, offset emissions through tree planting, recycle materials to minimize carbon footprint.
Child labour risk in informal demolition waste collection	High severity, localized, project duration, reversible	High	Monitor subcontractors, enforce labour laws, collaborate with local authorities to prevent child involvement in waste scavenging.

Table 9- 5: Decommission Phase Impact Mitigation Measures

8.3.5. Residual Impacts Mitigation Measures

Negative Impact	Residual Impact	Risk Rating	Mitigation Measures (Residual)
Air Emissions & GHG Contribution	Persistent GHG emissions from transport, backup generators, and electricity use	Moderate	Introduce carbon offset initiatives (tree planting, landscaping), promote staff carpool/public transport, gradually integrate solar PV and other renewables
Noise from Operations	Background noise from HVAC systems, generators, and office activities	Low	Regular equipment maintenance, limit generator testing to daytime, install noise-dampening enclosures
Solid Waste Generation	Non-recyclable office waste (plastics, packaging) still reaching landfills	Moderate	Adopt "zero-waste office" policy, prioritize eco-friendly procurement, staff sensitization, establish partnerships with recycling enterprises
Liquid Waste & Water Use	Ongoing effluent disposal and increased water demand on local supply	Moderate	Monitor effluent quality, reuse greywater for landscaping, install low-flow fixtures, promote staff water conservation practices
Traffic & Accessibility Issues	Persistent congestion from staff, visitors, and supply vehicles	Moderate	Stagger office hours, improve pedestrian safety measures, promote walking/cycling, collaborate with authorities on road safety improvements
Community Health & Safety Risks	Low-level risks of communicable diseases and minor accidents	Moderate	Maintain health awareness programs, provide workplace health checks, collaborate with local health facilities, enhance workplace wellness initiatives
Occupational Health & Safety Hazards	Residual risks such as slips, trips, ergonomic strain, and minor injuries	Moderate	Continuous staff training, periodic OHS audits, provision of ergonomic office setups, maintain first-aid facilities
Security Risks	Continued risk of theft, vandalism, or sabotage in sensitive areas	High	Maintain 24/7 security patrols, enhance surveillance and access control, and coordinate with local law enforcement
Climate Change Contribution	Long-term unavoidable emissions from building operations	High	Develop and enforce a Green Building Policy, increase renewable energy share, align with national climate commitments (NDCs)

Table 9- 6: Residual Impacts Mitigation Measures

9. ENVIRONMENTAL AND SOCIAL MANAGEMENT AND MONITORING PLAN

9.1. Introduction

The Environmental and Social Management and Monitoring Plan (ESMMP) for the proposed construction of Revenue Collection Offices across the four project towns outlines the systematic approach to managing and mitigating potential environmental and social impacts associated with the project during all phases: pre-construction, construction, operation, and eventual decommissioning.

The ESMMP emphasizes the implementation of practical measures aimed at eliminating, minimizing, or mitigating adverse environmental and social impacts to levels that are environmentally acceptable and socially responsible. The plan provides a structured framework to ensure that all mitigation measures identified in the Environmental and Social Impact Assessment (ESIA) are properly implemented, monitored, and evaluated throughout the project lifecycle.

Monitoring in this context is a continuous and long-term process commencing from the pre-construction phase, continuing through construction and operation. Its objectives are to:

- Establish environmental and social performance benchmarks;
- Track the effectiveness of proposed mitigation measures;
- Verify compliance with national regulations and donor safeguard requirements;
- Detect unforeseen or cumulative impacts early enough for timely corrective action.

Specifically, the ESMMP seeks to:

- Ensure full integration of environmental and social mitigation measures into project implementation and operational practices;
- Provide clear institutional arrangements and responsibilities for monitoring and reporting;
- Facilitate adaptive management by enabling mid-course adjustments where necessary;
- Enhance transparency and accountability in environmental and social risk management.

The ESMMP developed for the Revenue Collection Offices project incorporates key components such as impact-specific mitigation measures, performance indicators, institutional responsibilities, timelines, indicative costs, and monitoring mechanisms. This integrated approach supports the project's compliance with Somalia's environmental regulations, donor safeguard policies, and international best practices in infrastructure development.

9.2. Purpose and Scope

The purpose of the Environmental and Social Management and Monitoring Plan (ESMMP) is to safeguard both the biophysical and social environments from the potential adverse impacts of the proposed Revenue Collection Offices project in the four towns. The ESMMP serves as a practical reference and operational tool for all stakeholders involved in planning, implementation, supervision, and monitoring of environmental and social safeguards across all phases of the project.

The ESMMP provides a comprehensive framework outlining responsibilities, procedures, and mitigation measures necessary to minimize negative impacts, enhance positive outcomes, and ensure compliance with regulatory and donor requirements.

9.3. Scope of the ESIA

The Environmental and Social Management and Monitoring Plan (ESMMP) covers all activities under the proposed construction of Revenue Collection Offices across the four project towns. It addresses all significant environmental and social impacts anticipated during project implementation. The ESMMP clearly outlines:

- The parties responsible for environmental and social management and monitoring;
- The roles to be played by each party at different phases of the project;
- The general requirements for environmental and social management and monitoring;
- Provisions for decommissioning, site restoration, and rehabilitation;
- Indicative cost estimates to support budgeting for effective implementation of mitigation and monitoring measures.

This ESMMP ensures that the project is implemented in a manner that promotes environmental sustainability, social inclusion, and compliance with applicable national and international safeguard standards.

9.4. Key Elements of the ESMP

The Environmental and Social Management Plan (ESMP) for the construction and operation of the Revenue Collection Offices incorporates the following key components:

9.4.1. Mitigation Measures

The ESMP outlines site-specific and phase-specific mitigation measures to prevent, minimize, or offset potential adverse environmental and social impacts during pre-construction, construction, operation, and decommissioning phases. Measures cover air quality, water management, waste management, occupational health and safety, community health and safety, traffic, noise, climate change, and social risks such as GBV and child labor.

9.4.2. Institutional Arrangement

Clear institutional arrangements are defined, specifying the roles and responsibilities of implementing agencies, project managers, environmental and social focal persons, contractors, and other relevant stakeholders. This ensures accountability and effective coordination for the implementation of mitigation and monitoring measures across all four towns.

9.4.3. Monitoring Mechanism

Monitoring frameworks are established to track the effectiveness and compliance of the mitigation measures. This includes regular inspections, reporting, and corrective actions to address unforeseen or cumulative impacts. Monitoring covers environmental parameters, social outcomes, and adherence to national regulations and donor safeguard requirements.

9.4.4. Capacity Building

The ESMP provides for training programs, workshops, and awareness campaigns to enhance the technical and institutional capacity of project staff, contractors, and local stakeholders. Capacity-building efforts focus on environmental management, occupational health and safety, social safeguards, and effective community engagement.

9.4.5. Grievance Redress Mechanism (GRM)

A structured GRM is established to receive, document, and resolve complaints from project-affected persons (PAPs) and other stakeholders. The mechanism ensures timely, transparent, and fair resolution of grievances, enhancing trust and minimizing potential conflicts.

9.4.6. Stakeholder Consultation and Engagement

Continuous engagement with stakeholders, including local communities, authorities, civil society, and workers, is central to the ESMP. Consultations ensure stakeholder concerns are integrated into project design, mitigation strategies, and monitoring, fostering social acceptability and sustainable project outcomes.

9.4.7. Stakeholders in the Implementation of ESMP – Revenue Collection Offices

The successful implementation of the Environmental and Social Management and Monitoring Plan (ESMMP) for the construction of Revenue Collection Offices in Jowhar, Kismayo, Dhuusamareb, and Baidoa requires the active participation of multiple stakeholders. Each stakeholder plays a distinct and critical role in ensuring that environmental and social risks are effectively managed across all project phases: pre-construction, construction, operation, and decommissioning.

9.4.8. Directorate of Environment and Climate Change (DECC)

The DECC, under the Office of the Prime Minister, is the national regulatory authority responsible for reviewing and approving the ESIA and ESMMP for the revenue offices project. Its main responsibilities include:

- Ensuring compliance by the Ministry of Finance (MoF), contractors, and other stakeholders with national environmental laws and clearance conditions.
- Coordinating with federal and state Ministries of Environment and Climate Change to ensure environmental standards are maintained at all four sites.
- Providing guidance on mitigation measures to prevent, minimize, or manage adverse environmental impacts, including waste management, air quality, water protection, and climate resilience.

9.4.9. African Development Bank (AfDB)

As the project funder, AfDB plays an oversight and advisory role, ensuring that the construction of the revenue offices meets environmental and social safeguard standards. Responsibilities include:

- Monitoring compliance with AfDB environmental and social safeguards.
- Providing technical support and recommending additional measures to enhance project sustainability.
- Overseeing the integration of mitigation measures into day-to-day project implementation.

9.4.10. Ministry of Finance (MoF) – Project Developer

The MoF is the project developer and holds full accountability for environmental and social management across all four sites. Its responsibilities include:

- Collating environmental and social baseline data for each site.
- Ensuring that contractors implement all mitigation measures outlined in the ESMMP.

- Engaging with local communities, municipal authorities, and federal/state ministries on environmental and social matters.
- Overseeing grievance redress mechanisms, stakeholder consultations, and social inclusion initiatives.
- Submitting periodic environmental audit reports in line with Somalia's National Environmental Audit Guidelines.

9.4.11. Federal and State Ministries of Public Works

These ministries provide technical oversight during construction to ensure quality and adherence to environmental standards. Responsibilities include:

- Supervising civil works to ensure compliance with design specifications and safety standards.
- Supporting contractor monitoring and verification of mitigation measures.
- Coordinating with the MoF to integrate environmental and social safeguards into construction practices.

9.4.12. Federal and State Ministries of Environment and Climate Change

These ministries complement DECC's regulatory role at federal and state levels. Responsibilities include:

- Ensuring compliance with local environmental regulations during construction and operation of the revenue offices.
- Providing guidance on climate resilience measures, ecosystem protection, and sustainable resource use.
- Supporting environmental monitoring and reporting.

9.4.13. The Contractor

The contractor is directly responsible for implementing the ESMMP at all four sites. Key responsibilities include:

- Appointing a dedicated site Environmental and Social Officer to oversee compliance and guide site personnel.
- Developing and implementing site-specific Construction Environmental and Social Management Plans (CESMP) for each town.
- Ensuring safe work practices, proper handling of materials, and adherence to specifications in the Bill of Quantities (BOQ).
- Implementing measures to prevent occupational and community health risks, manage waste, and reduce emissions.

9.4.14. Project Implementation Unit (PIU)

A dedicated PIU within the MoF will coordinate daily activities for all four revenue office sites. Responsibilities include:

- Monitoring contractor compliance with the ESMMP across all towns.

- Coordinating communication between MoF, AfDB, DECC, federal and state ministries, and local communities.
- Preparing periodic environmental and social performance reports.
- Mainstreaming safeguards into all project activities and facilitating adaptive management of mitigation measures.

9.4.15. Municipal Authorities and Local Communities

Municipal authorities and local communities in each town are essential partners for project implementation. Responsibilities include:

- Participating in stakeholder consultations and awareness programs on environmental and social impacts.
- Reporting grievances and incidents through the established Grievance Redress Mechanism (GRM).
- Supporting project integration with local development priorities, ensuring social acceptance, and enhancing positive impacts such as employment opportunities.

9.4.16. Capacity Building and Awareness Training – Revenue Collection Offices Project

To ensure effective implementation of the Environmental and Social (E&S) requirements for the construction of Revenue Collection Offices in Jowhar, Kismayo, Dhuusamareb, and Baidoa, it is essential to build sufficient awareness and technical capacity around the Environmental and Social Management Plan (ESMP) and the mitigation measures identified in the Environmental and Social Impact Assessment (ESIA).

The Project Implementation Unit (PIU) will be responsible for coordinating capacity-building initiatives for all stakeholders, including contractors, subcontractors, site engineers, E&S officers, and other implementing partners. Ensuring that all parties fully understand their roles and responsibilities under the ESMP is critical to achieving safe, efficient, and environmentally sound execution of construction activities across all four sites.

9.5. Capacity Building and Training for Contractors' Employees

The contractor, along with any subcontractors, will be required to develop and implement a comprehensive in-house training and awareness program for all personnel engaged in the construction of the revenue offices. This program will aim to:

- Enhance workforce understanding of E&S requirements under the ESMP.
- Build practical skills for implementing mitigation measures on-site.
- Address site-specific risks, including occupational health and safety, waste management, traffic management, and community engagement.

The training will cover, but is not limited to:

- *Solid and hazardous waste management*: Proper segregation, storage, transport, and disposal to prevent soil, water, and air pollution.
- *Environmental Health and Safety (EHS) practices*: Safe handling of machinery, chemicals, and construction materials.
- *Use of Personal Protective Equipment (PPE)*: Ensuring all workers are correctly equipped and trained to minimize exposure to hazards.
- *First Aid and Emergency Response*: Administering basic medical assistance for injuries and reporting incidents promptly.
- *Climate-Resilient Practices*: Minimizing GHG emissions, reducing dust and noise, and conserving water and energy.
- *Gender-Based Violence (GBV) Awareness*: Promoting safe behaviors and mechanisms to report harassment or exploitation.
- *Community Engagement*: Understanding the importance of positive interactions with residents and stakeholders.

The contractor must allocate sufficient resources to deliver these trainings effectively and institute mechanisms to ensure the ESMP is operational at all four construction sites.

9.6. PIU-Led Training and Awareness

In addition to contractor-led capacity-building, the PIU, on behalf of the Ministry of Finance, will organize a consolidated E&S training session for project stakeholders, including:

- Ministry of Finance staff overseeing the project.
- Supervising engineers and site managers.
- Contractor-appointed E&S officers.
- Representatives from relevant federal and state ministries, including Environment and Public Works.

This training will be designed to cover all construction activities across the four towns, with content tailored to participants' technical levels. The training will include hands-on sessions for applying the ESMP, practical guidance on mitigation measures, and compliance with both national environmental regulations and AfDB safeguards, including the Integrated Safeguards System (ISS).

9.7. Objectives and Outcomes

The primary objectives of this capacity-building effort are to:

- Ensure that all stakeholders involved in the construction of revenue offices understand and comply with the ESMP.
- Build technical and practical skills necessary for environmental and social risk management.
- Foster a culture of safety, social responsibility, and sustainable construction practices.
- Minimize potential negative environmental and social impacts while enhancing positive outcomes such as community engagement and local employment.

Through structured training and continuous awareness programs, the project aims to ensure that all actors, including the PIU, contractors, and supervising engineers, are well-prepared to manage environmental and social risks effectively and efficiently, maintaining compliance with both national and international standards throughout the construction of the revenue collection office

9.8. Environmental and Social Management and Monitoring plan

Code	Project Phase	Activity / Impact	Mitigation / Enhancement Measures	Deadline / Timing	Monitoring Frequency	Key Performance Indicators (KPIs)	Implementation Responsibility	Monitoring / Oversight	Source of Funds
IMP-01	Pre-Construction	Land take & resettlement	Prepare & implement RAP, provide fair compensation, minimize land use	Before construction	Once (pre-construction)	Signed agreements, RAP completion	PIU, MoF, State Ministries	PIU Safeguards Unit	Project Budget
IMP-02	Pre-Construction	Soil, water, vegetation disturbance during surveys	Conduct baseline surveys with minimal soil disturbance, avoid sensitive areas	Pre-construction	Once (pre-construction)	Baseline reports completed	PIU, Env. Consultants	MoE, PIU	Project Budget
IMP-03	Pre-Construction	Community unpreparedness, conflict	Disclosure meetings, awareness sessions, hotline for grievances	Pre-construction	Bi-weekly during engagement	Consultation minutes, GRM records	PIU, Local Authorities	PIU, GRM Committee	Project Budget
IMP-04	Pre-Construction	Vulnerable groups exclusion	Inclusive consultations (women, PWDs, youth, VMGs)	Pre-construction	Each engagement	% of vulnerable groups consulted	PIU, NGOs, Local Chiefs	PIU Social Officer	Project Budget
IMP-05	Construction	Vegetation loss (site clearing)	Native species replanting, landscaping plan	After civil works	Weekly	Vegetation index, site photos	Contractor, MoE	PIU Env. Specialist	Contractor Budget
Code	**Project Phase**	**Activity / Impact**	**Mitigation / Enhancement**	**Deadline / Timing**	**Monitoring Frequency**	**Key Performance Indicators**	**Implementation**	**Monitoring /**	**Source of Funds**

			Measures			(KPIs)	Responsibility	Oversight	
IMP-06	Construction	Air pollution (dust, emissions)	Dust suppression, cover trucks, AQI monitoring, PPE for workers	Daily	Daily	Dust logs, AQI reports	Contractor	PIU, Env. Dept.	Contractor Budget
IMP-07	Construction	Noise & vibration	Restrict noisy work to day, install barriers, equipment maintenance	Throughout construction	Daily	Noise/vibration logs, complaints resolved	Contractor	PIU, Local Env. Dept.	Contractor Budget
IMP-08	Construction	Water pollution (runoff, spills)	Install containment basins, silt traps, no hazardous storage near drains	Continuous	Weekly	Water quality tests, drainage checks	Contractor	PIU, Sanitation Dept.	Contractor Budget
IMP-09	Construction	Soil compaction & erosion	Use defined routes, loosen compacted areas, erosion control	Weekly	Weekly	Site inspection reports	Contractor	ESMP Consultant	Contractor Budget
IMP-10	Construction	Pressure on utilities (water, electricity)	Stagger deliveries, liaise with utility providers, conservation measures	Weekly	Weekly	Utility outage/complaint logs	Contractor, Municipality	PIU, Utility Agencies	Project Budget
IMP-11	Construction	Solid & liquid waste	Segregate waste, recycle, use licensed disposal sites	Daily	Daily	Waste logs, inspections	Contractor	PIU, Sanitation Dept.	Contractor Budget

Code	Project Phase	Activity / Impact	Mitigation / Enhancement Measures	Deadline / Timing	Monitoring Frequency	Key Performance Indicators (KPIs)	Implementation Responsibility	Monitoring / Oversight	Source of Funds

IMP-12	Construction	Hazardous waste exposure	Licensed handlers, PPE, training, manifests	As needed	Monthly	Hazardous waste manifests, incident reports	Contractor	MoF Safeguards, PIU	Project Budget
IMP-13	Construction	Occupational health & safety	Daily toolbox talks, PPE, signage, trained H&S officer	Daily	Daily	Safety audits, incident reports	Contractor, H&S Officer	PIU H&S Expert	Contractor Budget
IMP-14	Construction	Child labour risk	Age verification, enforce labour policy	Pre-construction & ongoing	Weekly	Site audit reports, staff records	Contractor	PIU, Labour Office	Contractor Budget
IMP-15	Construction	GBV / SEA/SH	GBV Action Plan, worker sensitization, hotline, code of conduct	Pre-construction & ongoing	Monthly	GBV case logs, training attendance	Contractor, PIU	GBV Focal Point, Safeguards	Project Budget
IMP-16	Construction	HIV/STI risk	Awareness campaigns, condom distribution, health services	Monthly outreach	Monthly	Outreach reports, STI clinic referrals	PIU, MoH Partner	Local Health Dept.	Project Budget
IMP-17	Construction	Population influx & conflict	Prioritize local hiring, CoC enforcement, grievance redress	Pre-deployment & ongoing	Monthly	Grievance logs, % local hires	Contractor, PIU	Local Admin	Project Budget
IMP-18	Construction	Community disturbance (traffic, noise, safety)	Notice boards, detour signs, community liaison officer	Daily	Weekly	Resolved complaints	Contractor, Local Authority	PIU	Project Budget

Code	Project Phase	Activity / Impact	Mitigation / Enhancement Measures	Deadline / Timing	Monitoring Frequency	Key Performance Indicators (KPIs)	Implementation Responsibility	Monitoring / Oversight	Source of Funds

IMP-19	Construction	Climate change (GHG emissions)	Energy-efficient machinery, track fuel use, offsets (tree planting)	Continuous	Monthly	Fuel logs, GHG estimates	Contractor	ESMP Consultant, PIU	Project Budget
IMP-20	Construction	Security risks (crime, theft, terrorism)	Fencing, guards, lighting, 24/7 surveillance	Continuous	Weekly	Security logs, breach reports	Contractor, MoF Security	PIU, Security Dept.	Project Budget
IMP-21	Construction	Awareness & emergency preparedness	Sensitization sessions, IEC materials, hotline	Start-up + ongoing	Monthly	Session reports	PIU, CDO	GRM Committee	Project Budget
IMP-22	Construction	Safeguards & GBV capacity building	AfDB ISS & GBV training for contractors, supervisors	Pre-mobilization	Once (pre-works)	Training records, test scores	PIU	MoF Capacity Fund	Project Budget
IMP-23	Operation	Air emissions (GHG, HVAC, gensets)	Renewable energy integration, energy-efficient systems	Continuous	Quarterly	Energy audit reports	PIU, Facility Manager	PIU, Env. Dept.	O&M Budget
IMP-24	Operation	Office waste (solid, e-waste)	Waste segregation, recycling, zero-waste policy	Weekly	Monthly	Waste audit reports	Facility Manager	PIU, Municipality	O&M Budget
IMP-25	Operation	Liquid waste (sewage, greywater)	Proper treatment, oil-water separators, monitoring	Continuous	Monthly	Effluent test results	Facility Manager	PIU, Sanitation Dept.	O&M Budget
Code	**Project Phase**	**Activity / Impact**	**Mitigation / Enhancement Measures**	**Deadline / Timing**	**Monitoring Frequency**	**Key Performance Indicators (KPIs)**	**Implementation Responsibility**	**Monitoring / Oversight**	**Source of Funds**
IMP-26	Operation	Water demand pressure	Install water-saving devices, rainwater	Continuous	Quarterly	Water audit reports	Facility Manager	PIU	O&M Budget

			harvesting						
IMP-27	Operation	Traffic congestion & safety	Traffic management plan, signage, staff shuttles	Continuous	Monthly	Traffic log, accident reports	Facility Manager	Local Traffic Police, PIU	O&M Budget
IMP-28	Operation	OHS hazards (office staff)	Ergonomic workstations, fire drills, PPE	Continuous	Quarterly	Audit reports, incident logs	Facility Manager	PIU, OHS Officer	O&M Budget
IMP-29	Operation	Security risks (vandalism, terrorism)	Surveillance systems, police coordination, access control	Continuous	Monthly	Security logbooks	MoF Security	PIU Security Dept.	O&M Budget
IMP-30	Decommissioning	Demolition waste & debris	Controlled demolition, recycling, licensed disposal	End of project	Weekly	Waste logs, site inspections	Contractor	PIU, MoE	Contractor Budget
IMP-31	Decommissioning	Dust, noise & vibration	Controlled demolition, suppression, daytime work	During demolition	Daily	Noise logs, dust logs	Contractor	PIU	Contractor Budget
IMP-32	Decommissioning	Soil & groundwater contamination	Proper storage, remediation of contaminated sites	During demolition	Weekly	Soil/water test results	Contractor	Env. Specialist, PIU	Contractor Budget
Code	**Project Phase**	**Activity / Impact**	**Mitigation / Enhancement Measures**	**Deadline / Timing**	**Monitoring Frequency**	**Key Performance Indicators (KPIs)**	**Implementation Responsibility**	**Monitoring / Oversight**	**Source of Funds**
IMP-33	Decommissioning	OHS hazards	Safety induction, PPE, emergency plan	Daily	Daily	H&S audit logs	Contractor	PIU H&S Expert	Contractor Budget

IMP-34	Decommissioning	Child labour risk (waste scavenging)	Strict subcontractor control, collaborate with local authorities	Ongoing	Monthly	Labour audit reports	Contractor	Labour Office, PIU	Contractor Budget
IMP-35	Decommissioning	Social impacts (job loss)	Transition support, link workers to new jobs	End of project	Once	Training certificates, redeployment records	PIU, MoF	Labour Dept.	Project Budget
IMP-36	Residual	Long-term GHG emissions	Carbon offsets (tree planting, renewables)	Post-commissioning	Annual	Carbon audit, offset records	PIU, Facility Manager	Env. Dept.	O&M Budget
IMP-37	Residual	Traffic & accessibility	Improve walkways, collaborate with municipalities	Post-commissioning	Annual	Road safety reports	PIU, Local Govt	O&M Budget	
IMP-38	Residual	Community health & safety	Workplace wellness, linkages with health facilities	Continuous	Quarterly	Clinic reports, outreach records	Facility Manager, PIU	MoH	O&M Budget

Table 10- 1: Environmental and Social Management and Monitoring Plan

9.9. Estimated ESMP Implementation Cost

Category	Activity	Unit	Quantity	Unit Cost (USD)	Total Cost (USD)	Source of Fund
Pre-Construction	Land surveys & resettlement agreements	Survey & Consultation	4 sites	3,000	12,000	Project Budget
	Baseline environmental assessment	Report	4	2,000	8,000	Project Budget
	Community awareness & consultation	Session	4	1,500	6,000	Project Budget
Construction	Dust suppression (water spraying, covered trucks)	Monthly	12	500	6,000	Contractor Budget
	Noise & vibration mitigation (barriers, shields, monitoring)	Monthly	12	400	4,800	Contractor Budget
	Solid & liquid waste management	Waste bins, collection, disposal	12 months	700	8,400	Contractor Budget
	Occupational Health & Safety (PPE, training, first aid)	Workers	200	150	30,000	Contractor Budget
	Child labor prevention & monitoring	Site audit	12	200	2,400	Contractor Budget
	GBV/SEAH prevention (training, hotline, awareness)	Training/Materials	4 sites	1,000	4,000	Project Budget
	HIV/STI awareness & services	Awareness sessions + condoms	4 sites	1,000	4,000	Project Budget
	Climate change mitigation (fuel monitoring, trees, efficient machines)	Units	12	300	3,600	Project Budget
	Community awareness (hotline, preparedness)	Awareness sessions	4	1,200	4,800	Project Budget
	ISS & GBV training for staff	Training	1	5,000	5,000	Capacity Fund

Category	Activity	Unit	Quantity	Unit Cost (USD)	Total Cost (USD)	Source of Fund
Operation	Waste management (bins, collection, recycling)	Monthly	48	200	9,600	Operational Budget
	Energy efficiency & renewable measures	Installation/Equipment	4	2,000	8,000	Operational Budget
	Water & sanitation (treatment, hygiene promotion)	Monthly	48	150	7,200	Operational Budget
	Security & access control	Guards, fencing	Monthly	500	24,000	Operational Budget
	HIV/STI awareness & GBV reporting	Awareness sessions	4	1,000	4,000	Operational Budget
Decommissioning	Equipment & hazardous waste disposal	Site	4	3,000	12,000	Decommissioning Budget
	Waste segregation & licensed disposal	Site	4	1,500	6,000	Decommissioning Budget
	Site rehabilitation & landscaping	Site	4	2,000	8,000	Decommissioning Budget
	Community notification & access restoration	Site	4	800	3,200	Decommissioning Budget

Table 10- 2: Estimated ESMP Implementation Cost

9.10. Grievance Redress Mechanism (GRM)

The Grievance Redress Mechanism (GRM) is a critical component of the Environmental and Social Management Plan (ESMP) for the construction of revenue collection offices in Jowhar, Kismayo, Dhuusamareb, and Baidoa. The GRM provides a systematic, transparent, and accessible process through which project-affected individuals, communities, workers, and other stakeholders can raise concerns, complaints, or feedback related to the construction activities.

The GRM is intended to prevent, minimize, and manage social and environmental conflicts that may arise during construction, including impacts on occupational safety, community health, environmental quality, and social well-being. It is designed to foster trust between the project implementers and stakeholders, ensuring that grievances are handled fairly, effectively, and in compliance with national legislation, local government requirements, and the African Development Bank (AfDB) Integrated Safeguards System (ISS).

A well-functioning GRM is essential for project sustainability, as unresolved grievances can lead to delays, social tension, reputational risk, and potential violations of labor and environmental regulations.

9.10.1. Objectives of the GRM

The key objectives of the GRM are to:

- Provide a clear, structured, and accessible platform for stakeholders to voice complaints or concerns related to the project.
- Ensure grievances are addressed in a timely and transparent manner, minimizing the risk of escalation.
- Promote accountability and responsiveness by the Ministry of Finance (MoF), contractors, and other implementing agencies.
- Identify systemic issues arising from grievances to inform adaptive management and improve project planning and implementation.
- Safeguard vulnerable groups, including women, children, and persons with disabilities, from any form of retaliation or discrimination.

9.10.2. Scope of the GRM

The GRM covers all grievances related to the **construction phase** of the revenue collection offices, including:

- Environmental impacts: dust, noise, vibration, soil erosion, water contamination, waste management, and greenhouse gas emissions.
- Occupational health and safety: accidents, unsafe work practices, inadequate personal protective equipment (PPE), and exposure to hazardous materials.
- Social issues: gender-based violence (GBV), harassment, child labor, HIV/STI risks, and community disruption.
- Community impacts: restricted access, traffic disruption, damage to private property, or disruption of livelihoods.
- Security threats: theft, unauthorized site access, or other risks associated with the project.

The GRM also addresses feedback and suggestions from stakeholders that can help improve project performance and social acceptance.

9.10.3. Principles Guiding the Grievance Redress Mechanism (GRM)

The GRM for the Revenue Collection Offices will operate under the following key principles to ensure fairness, accessibility, and effectiveness:

- Accessibility: The mechanism will be designed to be easily accessible to all stakeholders, including individuals of varying literacy levels, gender, age, or disability. Multiple channels (in-person, hotline, email, suggestion boxes) will be provided to facilitate grievance submission.
- Transparency: Procedures, timelines, and responsibilities for grievance handling will be clearly communicated to all stakeholders to promote accountability and trust.
- Confidentiality: The identities and personal information of complainants will be protected at all stages of grievance handling to ensure privacy and build confidence in the system.
- Responsiveness: All grievances will be formally acknowledged within three (3) working days of receipt, with resolution pursued within a clearly defined and reasonable timeframe.
- Non-Retaliation: Complainants will be safeguarded against any form of retaliation, discrimination, or adverse action resulting from submitting a grievance.

9.10.4. Major Role of the Grievance Committee

The primary role of the Grievance Committee is to receive, review, and resolve complaints related to ethical concerns, project activities, and stakeholder grievances. Upon initial assessment, the committee determines whether the issues raised require formal investigation or hearing. If warranted, the committee facilitates a fair resolution process or escalates the matter to higher administrative levels as appropriate. Throughout the project lifecycle, the committee ensures consistent, transparent, and timely communication with all relevant stakeholders.

A dedicated Grievance Redress Committee will be established for the Revenue Collection Offices in each state (Baidoa, Dhuusamareb, Jowhar, Kismayo), comprising the following members:

- Project Implementation Unit (PIU) Representative for the respective state – Chair
- Ministry of Finance (MoF) Representative
- Community Representative (local elder or leader)
- Women/Youth Representative
- Environmental & Social Safeguards Officer
- Contractor Representative

9.10.5. Role of the Grievance Mechanism

The grievance mechanism is a critical tool for promoting transparency, accountability, and stakeholder trust throughout the construction and operational phases of the Revenue Collection Offices. Its key responsibilities include:

- Establishing an Accessible Process: Develop a clear, culturally appropriate, and user-friendly procedure for receiving, recording, and addressing complaints. The process must be easily understood and accessible to all community members, including vulnerable groups such as women, youth, persons with disabilities, and marginalized populations.
- Community Awareness: Ensure that affected communities are informed about the existence, purpose, and functionality of the grievance mechanism during stakeholder engagement activities, public meetings, and information campaigns.
- Collaborative Resolution: Promote a participatory approach by involving affected communities in identifying and implementing appropriate solutions to grievances, ensuring fairness and community ownership of resolutions.
- Risk-Based Scaling: The mechanism will be designed and scaled according to the potential risks and adverse impacts associated with the project, ensuring proportional response capacity.
- Timely and Transparent Resolution: Complaints will be addressed promptly through a clear, transparent, and easily navigable process. The mechanism will be accessible at no cost to complainants and will include protections against retaliation.
- Inclusive Participation: The mechanism will guarantee meaningful participation of both women and men, while ensuring the inclusion of vulnerable and marginalized groups.
- Respect for Traditional Practices: Where appropriate, customary and traditional dispute resolution practices will be incorporated to complement formal grievance handling.
- Dedicated Personnel: Qualified and experienced staff within the project team will manage the grievance process, ensuring consistent and responsive handling of all complaints.
- Escalation and Redress: A clear appeals or redress pathway will be established for grievances not satisfactorily resolved, allowing for referral to independent or external bodies.
- Documentation and Reporting: Accurate records of all grievances, actions taken, and resolutions provided will be maintained. Regular feedback will be communicated to the community, and periodic reports will identify recurring issues and systemic concerns for continuous improvement.

9.10.6. GRM PROCESS FLOW

Step	Action	Responsible Party	Timeline
1	Submission of grievance by affected person (oral, written, via phone, SMS, WhatsApp, email, or drop box at site)	Complainant	Ongoing
2	Recording of grievance in the Grievance Register (including date, name, contact, nature of complaint)	Site Grievance Officer (part of PIU for the respective state)	Within 1–2 working days
3	Acknowledgement of receipt of grievance to complainant	Grievance Officer / PIU	Within 3 working days
4	Assessment and investigation (field visits, stakeholder meetings, document review if necessary)	PIU, Contractor, Environmental & Social Safeguards Officer	Within 7–10 working days
5	Response / resolution provided to complainant (written feedback or meeting)	PIU, MoF, Local Authority (if needed)	Within 15 working days
6	Complainant feedback and closure if grievance is resolved	Complainant & PIU	Within 2 working days of resolution
7	Escalation if unresolved to Grievance Redress Committee or external mediation (e.g., MoF Legal Unit or court)	PIU, MoF GRM Committee	As needed

Table 10- 3: GRM Process Flow

9.10.7. Potential Grievance Categories

The Grievance Redress Mechanism (GRM) for the Revenue Collection Offices will address a broad range of concerns arising from construction and operation activities. Key categories include:

- *Environmental Complaints*: Issues related to dust, noise, vibrations, waste management, water pollution, or other forms of environmental nuisance.
- *Safety Concerns*: Reports regarding occupational health and safety of workers, public safety risks, or unsafe site conditions.
- *Land Use and Access*: Complaints concerning land acquisition, site access restrictions, or impacts on neighboring properties.
- *Labour and Employment*: Grievances related to recruitment, working conditions, wage disputes, or labor rights violations.
- *Gender-Based Violence (GBV) and Harassment:* Incidents of sexual exploitation, abuse, or harassment, with appropriate referral to confidential GBV support and response services.
- *Project Communication*: Issues stemming from delays, miscommunication, or inadequate dissemination of project information to stakeholders.
- *Other Community Concerns*: Any additional adverse impacts or concerns raised by affected communities, including social, cultural, or economic effects.

9.10.8. Monitoring and Reporting

To ensure transparency, accountability, and the effectiveness of the Grievance Redress Mechanism (GRM), a structured monitoring and reporting framework will be implemented. The Project Implementation Unit (PIU), supported by the Environmental and Social Safeguards Officer, will be responsible for overseeing all aspects of grievance management, including recording, tracking, investigation, resolution, and closure of complaints.

Key components of the monitoring and reporting framework include:

- *Regular Tracking:* All grievances will be logged in a central Grievance Register, capturing details such as the date of submission, complainant information, nature of the grievance, actions taken, and resolution status.
- *Periodic Reporting*: The PIU will generate monthly and quarterly reports summarizing the number, type, and status of grievances, as well as trends or recurring issues. Reports will highlight any challenges encountered in grievance resolution and recommend corrective actions.
- *Feedback to Stakeholders*: Complainants will receive timely updates on the progress and outcome of their grievances. Summarized information will also be shared with the broader community to maintain trust and transparency.
- *Review and Improvement*: The GRM will be periodically reviewed to assess its effectiveness, responsiveness, and alignment with national regulations and international best practices. Lessons learned will inform improvements to grievance management procedures.

9.10.9. Grievance Register

A Grievance Register will be maintained at each project site and at the Project Implementation Unit (PIU) office. This register will be updated continuously and will serve as a central record of all complaints, concerns, or feedback related to the construction activities. The Grievance Register will include the following fields:

- **Date of Complaint:**

1. The exact date the grievance was received.
2. This helps track response times and ensures that grievances are addressed within the defined timelines.

- **Complainant Identity:**

1. Name, contact details, and affiliation (if the complainant chooses to disclose).
2. The register will also accommodate anonymous grievances to ensure inclusivity and protect vulnerable individuals.

- **Nature of Grievance:**

1. A concise description of the issue.
2. Categorized as environmental (e.g., noise, dust, air quality), social (e.g., labor concerns, displacement), safety-related (e.g., accidents, unsafe work practices), or gender-based (e.g., harassment, GBV).

- **Steps Taken:**

1. Detailed actions taken to address the grievance, including meetings, site inspections, mediation, or consultations with relevant stakeholders.
2. Documentation of any follow-up measures and corrective actions implemented.

- **Responsible Officer/Party:**

1. The designated person or entity tasked with resolving the grievance, e.g., Safeguards Officer, Contractor, PIU representative, or MoF official.

- **Resolution Status:**

  Indicates the current stage of the grievance:

  - Resolved and Closed – grievance successfully addressed.
  - In Progress – under investigation or awaiting feedback.
  - Escalated – forwarded to the Grievance Redress Committee (GRC) or legal/administrative authorities.

- **Timeframe:**

1. Record of how long it took to resolve or escalate the grievance.
2. Used to monitor compliance with established response timelines and improve efficiency.

9.10.10. Monthly Monitoring Reports

The Project Implementation Unit (PIU), through the Environmental and Social Safeguards Officer, will generate monthly grievance monitoring reports. These reports will provide a summary and analysis of grievances received and serve as a management tool to ensure timely resolution and adaptive mitigation.

Each monthly report will include:

- **Summary of Grievances:**

1. Total number of grievances received during the reporting period.
2. Categorization by type: environmental, social, safety, or gender-based.

- **Resolution Status:**

1. Number of grievances resolved and closed.
2. Number of grievances in progress.
3. Number of grievances escalated for further action.

- **Key Trends and Patterns:**

1. Identification of recurring issues, e.g., repeated complaints about dust, noise, labor practices, or waste management.
2. Analysis to inform proactive mitigation measures and continuous improvement.

- **Action Points and Follow-Up:**

1. Recommendations for addressing unresolved or systemic grievances.

2. Specific follow-up actions and responsible parties.

- **Stakeholder Reporting:**

Monthly reports will be shared with:

- Ministry of Finance (MoF) – to ensure accountability and oversight.
- Relevant local authorities (municipal or regional offices) – for regulatory compliance and support.
- Development partners, if applicable – to demonstrate adherence to environmental and social safeguards.
- Community liaison representatives or stakeholder forums – where appropriate, to ensure transparency and community engagement.

9.10.11. Continuous Improvement

The Project Implementation Unit (PIU), in collaboration with project partners, will regularly analyze grievance trends to identify and address systemic issues. This process will focus on:

- Communication and Stakeholder Engagement Gaps: Identifying areas where project information is not effectively reaching affected communities.
- Recurring Technical or Operational Issues: Highlighting repeated problems in construction, operations, or service delivery that require corrective action.
- Policy or Procedural Weaknesses: Detecting deficiencies in project procedures, administrative processes, or GRM protocols.

Insights gained from this analysis will guide ongoing improvements in project design, stakeholder engagement strategies, environmental and social mitigation measures, and overall risk management, ensuring adaptive and responsive project implementation.

9.10.12. Appeals and Legal Recourse

While the project prioritizes resolving grievances amicably at the community level, some complaints may remain unresolved to the satisfaction of the complainant. To ensure fairness, equity, and access to higher levels of redress, the following escalation pathways are available:

1. Appeal to the Ministry of Finance or an Independent Mediator

If a complainant is dissatisfied with the resolution provided by the Project Implementation Unit (PIU) or the Grievance Redress Committee (GRC), they have the right to:

- File a formal written appeal to the Office of the Director General or the Public Complaints Division of the Ministry of Finance.
- Request an independent mediator or ombudsperson (where available) to facilitate dialogue between parties and propose a neutral resolution.

All appeals to the Ministry of Finance will be logged, tracked, and responded to within a defined period, normally 15 working days, ensuring timely and transparent handling.

2. Legal Recourse through Somalia's Judiciary

As a final step, unresolved grievances may be escalated to Somalia's formal legal system. This may include:

- Filing a case with a competent court of law, such as a local civil court or administrative tribunal.
- Engaging legal aid or community-based legal advisors, where necessary, to support the complainant.
- Requesting legal intervention in cases involving human rights violations, land disputes, labour violations, or gender-based violence (GBV).

10. CONCLUSION AND RECOMMENDATION

10.1. Conclusion

The Environmental and Social Impact Assessment (ESIA) conducted for the proposed construction of the Revenue Collection Offices across the four project sites in Jowhar, Baidoa, Kismayo, and Dhuusamareb concludes that the project is environmentally, socially, and economically viable. The proposed development is consistent with Somalia's national priorities aimed at strengthening governance systems, improving fiscal transparency, and enhancing domestic revenue collection. It represents a strategic investment in institutional infrastructure that will contribute to improved public service delivery and overall economic growth.

The assessment established that while the project will generate numerous social and economic benefits, it also presents certain environmental and social risks that require careful management. Potential adverse impacts identified during the pre-construction and construction phases include localized dust emissions, noise generation, waste accumulation, occupational health and safety risks, and temporary disturbances to nearby communities. The Baidoa site, which lies within a community setting, may experience more significant social interactions, such as interference with local businesses and increased risk of accidents, compared to the other three sites located within fenced government compounds. Additionally, the influx of construction workers may lead to public health concerns, including the potential spread of communicable diseases such as HIV/AIDS, and may heighten the risk of gender-based violence (GBV) or sexual exploitation and abuse (SEA) if not properly managed.

Despite these challenges, the impacts are largely site-specific, reversible, and can be mitigated through strict implementation of the Environmental and Social Management Plan (ESMP) and adherence to both national environmental regulations and the World Bank Environmental and Social Standards (ESSs). The ESIA further establishes that the project will result in significant positive outcomes. It will create employment opportunities for local residents, stimulate small-scale businesses, and support skill development within the construction sector. Upon completion, the offices will provide a conducive working environment for staff, promote operational efficiency, and enhance accountability and transparency in revenue collection and management. The resulting institutional strengthening will foster public confidence and contribute to sustainable governance across the Federal Member States.

In addition, the project's design, which prioritizes the use of government-owned land in Jowhar, Kismayo, and Dhuusamareb, minimizes the risk of land acquisition, displacement, or resettlement, ensuring compliance with environmental and social safeguards. The inclusion of HIV/AIDS awareness, prevention, and voluntary testing programs during project implementation will help mitigate health-related risks among workers and surrounding communities. Furthermore, continuous stakeholder engagement, capacity building, and effective monitoring will ensure that environmental and social risks are addressed promptly and that benefits are maximized for all stakeholders. Therefore, the ESIA concludes that the project can be implemented in a manner that upholds environmental sustainability, promotes social inclusion, and supports long-term economic development, provided that the recommended mitigation measures are fully applied and regularly monitored throughout the project cycle.

10.2. Recommendations

To ensure that the proposed project achieves its intended benefits while maintaining compliance with environmental and social safeguards, the following recommendations are made:

10.2.1. Full Implementation of the ESMP:

The Project Implementation Unit (PIU) and contractors must integrate all proposed mitigation measures into contractual obligations and monitor their execution throughout the project lifecycle.

10.2.2. Institutional Capacity Building:

Enhance the capacity of PIU safeguards officers, contractors, and supervising consultants through training in environmental management, social safeguards, occupational health and safety (OHS), and community relations.

10.2.3. Site-Specific Management and Monitoring:

Pay particular attention to the Baidoa site, where the project area is within a community setting. Tailored management plans should be implemented to minimize noise, vibration, and disruption to neighboring households and small businesses.

10.2.4. Waste and Pollution Control:

Develop and enforce a site-specific waste management plan to ensure proper collection, segregation, and disposal of construction waste. Measures for dust suppression, wastewater management, and spill prevention should be implemented and regularly monitored.

10.2.5. Occupational Health and Safety (OHS):

All workers must be provided with appropriate Personal Protective Equipment (PPE) and trained in safe working practices. Regular toolbox talks, health and safety briefings, and safety audits should be conducted, with a designated safety officer present at each site.

10.2.6. HIV/AIDS Awareness, Prevention, and Testing:

The contractor and PIU should collaborate with local health authorities and NGOs to implement an HIV/AIDS prevention and testing program for workers and nearby communities. This should include:

- Awareness campaigns and peer education on HIV/AIDS and sexually transmitted infections (STIs).
- Access to voluntary counseling and testing (VCT) services.
- Distribution of condoms and IEC (Information, Education, and Communication) materials.
- Regular sensitization sessions addressing sexual health, GBV, and SEA prevention.

10.2.7. Gender and Social Inclusion:

Ensure gender equity in employment opportunities, provide safe working environments for women, and maintain zero tolerance for harassment or exploitation. The project should also promote youth engagement and inclusion of persons with disabilities.

10.2.8. Stakeholder Engagement and Grievance Redress:

Maintain continuous communication with communities, local leaders, and government representatives. The Grievance Redress Mechanism (GRM) should remain functional, accessible, and transparent throughout project implementation.

10.2.9. Monitoring, Evaluation, and Reporting:

Conduct regular environmental and social monitoring to track compliance, identify gaps, and apply corrective measures. Safeguard performance reports should be prepared quarterly and shared with relevant authorities and financiers.

10.2.10. Post-Construction Rehabilitation:

Upon completion, contractors must restore disturbed areas, remove construction debris, landscape the sites, and ensure reinstatement of any community infrastructure temporarily affected during construction.

10.2.11. Sustainability and Green Building Practices:

Where feasible, the project should integrate energy-efficient technologies, solar lighting and water-saving fixtures in building design and operation to promote long- term sustainability.

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12. APPENDICES

Appendix 1: Contractor's C-ESMP Contents

No.	Section Title	Description / Key Contents
1.0	Project Background Information	Overview of the project, objectives, site location, size of building, and nature of construction works.
2.0	General Information	Contractor's details, key staff, supervision structure, and duration of works.
3.0	Contractor's Environmental, Social, Health and Safety (ESHS) Policy	Commitment to compliance with environmental laws, occupational safety, and social protection.
4.0	Licenses and Permits	Building and environmental permits, waste disposal authorization, labor and safety approvals.
5.0	Personal Protective Equipment (PPE) and Worker Welfare	PPE requirements, provision of welfare facilities (toilets, clean water, first aid station, shaded rest areas).
6.0	Scope and Objectives of the C-ESMP	Purpose of the plan and specific ESHS objectives for building construction activities.
7.0	Project Description and Baseline Conditions	Description of the construction site, surrounding land use, and key environmental/social sensitivities.
8.0	Legal and Institutional Framework	Summary of applicable laws and regulations including the Puntland Environmental Regulation, Somali Labour Code (1972), and National Environmental Policy.
9.0	Roles and Responsibilities	Organizational chart and ESHS roles of site manager, safety officer, workers, and supervising engineer.
10.0	Training, Competence, and Awareness	Safety induction, toolbox talks, HIV/AIDS and STI awareness, and continuous ESHS training for workers.
11.0	Standard Operating Procedures (SOPs)	Operational procedures for key site activities (excavation, concreting, scaffolding, electrical works).
12.0	Stakeholder Engagement and Grievance Management	Site-level communication strategy, public notices, and grievance handling for workers and community.
13.0	Environmental and Social Management Plan (ESMP) for Site Activities	Activity-specific measures for dust suppression, waste handling, noise control, and material storage.
14.0	Occupational Health and Safety Management Plan (HSMP)	Site access control, equipment maintenance, work-at-height safety, and emergency response procedures.
15.0	Waste Management Plan	Segregation, temporary storage, collection, and approved offsite disposal of construction and domestic waste.
16.0	Noise and Dust Control Plan	Measures to minimize dust (water sprinkling, covering materials) and limit noise from machinery.
17.0	Hazard Prevention and Emergency Preparedness Plan	Risk identification, fire prevention, accident reporting, and response procedures.
18.0	Community Health and Safety Plan	Traffic control near the site, signage, restricted access, and prevention of public exposure to hazards.

No.	Section Title	Description / Key Contents
19.0	HIV/AIDS, STI, and Substance Abuse Prevention Plan	On-site HIV testing, awareness sessions, condom distribution, counseling, and prohibition of drugs and alcohol.
20.0	Gender-Based Violence (GBV) and Sexual Exploitation and Abuse (SEA) Prevention Plan	Code of conduct for workers, awareness training, and mechanisms for confidential reporting.
21.0	Security Management Plan	Site security arrangements and coordination with local authorities to protect workers and assets.
22.0	Worker's Code of Conduct	Behavior standards promoting respect, non-discrimination, integrity, and safety compliance.
23.0	Traffic and Transport Management Plan	Movement of vehicles, material delivery scheduling, pedestrian safety, and accident prevention.
24.0	Erosion and Drainage Management Plan	Temporary drainage control, protection of exposed soils, and proper water discharge.
25.0	Material Storage and Handling Plan	Safe storage of cement, fuels, paints, and other materials to prevent spills or contamination.
26.0	Chance Finds Procedure (Cultural Heritage)	Steps to follow if cultural or historical materials are discovered during excavation.
27.0	Site Restoration and Decommissioning Plan	Post-construction clean-up, landscaping, removal of debris, and restoration of disturbed areas.
28.0	Documentation, Reporting and Record Keeping	Requirements for maintaining logs, inspection records, training registers, and ESHS performance reports.

Appendix 2: Grievance Resolution Forms and Database (Log) Template

Complainant Information	
Full Name:	
PAP ID Number (if applicable):	
Gender:	□ Male □ Female □ Other
Telephone Number:	
Email Address (if any):	
District / Location:	
Physical Address / Landmark:	

Nature of Grievance or Complaint

Category of Grievance:	□ Land/Property □ Construction Impact □ Worker Conduct □ Compensation □ Environmental Issue (dust, noise, waste) □ GBV/Harassment □ Other (specify): _____
Description of Grievance:	*(Provide full details including date, time, location, and parties involved)*

Action / Follow-Up

Date of Follow-Up Discussion:	
Summary of Discussion and Proposed Solution:	
Responsible Officer / Institution:	
Designation / Title:	
Phone / Email Contact:	
Agreed Corrective Action(s):	
Expected Date of Resolution:	

Resolution Outcome

Resolution Outcome	
Resolution Achieved:	☐ Yes ☐ No ☐ Pending
Date Resolved:	
Description of Resolution Provided:	
Complainant's Satisfaction:	☐ Satisfied ☐ Partially Satisfied ☐ Not Satisfied
Complainant's Signature:	
Date:	
Grievance Officer's Name and Signature:	
Date:	

Grievance Register / Database (Log Template)

No.	Grievance Reference No.	Date Received	Name of Complainant	Nature of Grievance	Location / District	Contact Details	Follow-Up Action Taken	Responsible Officer	Date Resolved	Resolution Status (Open/Closed)	Remarks / Notes

Appendix 3: Environmental and Social Rules for Contractors

Rule Category	Requirements / Actions
General Obligations	- Ensure maximum protection of the environment, human health, and community well-being.- Obtain all necessary environmental permits, approvals, and licenses before commencing work.- Familiarize with and implement all mitigation measures and recommendations in the ESMP.- Coordinate with the PIU, Supervising Engineer, and relevant authorities to ensure compliance.- Maintain copies of the ESMP and compliance documents on site and make them available to inspectors.
Environmental Protection	- Prevent pollution of soil, air, and water resources.- Implement dust suppression, erosion control, and noise management measures.- Store and handle hazardous materials safely to avoid spills and leaks.- Protect existing vegetation and avoid unnecessary land disturbance.- Restore disturbed areas after completion of works.
Occupational Health and Safety (OHS)	- Provide and enforce the use of appropriate PPE for all workers.- Maintain clean, safe, and hygienic working conditions with adequate sanitation and potable water.- Conduct safety inductions, regular toolbox talks, and training.- Establish emergency preparedness procedures and first aid facilities on site.- Report and investigate all incidents, near misses, and accidents.
Waste Management	- Segregate waste (hazardous, non-hazardous, recyclable) at the source.- Dispose of construction and demolition waste only at approved sites.- Reuse or recycle materials where possible.- Prevent littering and uncontrolled dumping.- Maintain waste records and disposal certificates.
Acquisition of Construction Materials	- The contractor shall ensure that all construction materials such as sand, quarry stones, soil, or any other materials are acquired from approved and licensed suppliers.- The contractor must confirm that material production by suppliers or self-production does not violate environmental laws or regulations.- Extraction of materials must comply with national and local environmental protection standards.
Movement and Transportation of Demolition/Construction Materials	- Transportation of construction and demolition materials shall be carried out in a manner that minimizes dust, spillage, and traffic disruption.- Vehicles transporting loose materials must be covered to prevent dust emission and spillage.- Movement of heavy machinery should follow designated access routes to minimize disturbance to the community.- Transportation activities must comply with road safety regulations and the ESMP requirements.
Storage of Construction Materials	- Construction materials shall be stored safely and in designated areas to prevent obstruction, contamination, or accidents.- Storage must not obstruct service roads, driveways, footpaths, or drainage channels.- Where obstruction is unavoidable, the

Rule Category	Requirements / Actions
	contractor shall provide safe and accessible alternative routes for vehicles and pedestrians.- Materials must be stored to prevent contamination of soil, groundwater, and surface water.- Unauthorized public access to storage areas is strictly prohibited.- Access to hazardous materials (e.g., chemicals, solvents, oils) shall be restricted to trained and authorized personnel wearing proper PPE.- All hazardous or corrosive materials must be properly labeled and securely stored to avoid leakage or exposure.
Community Health and Safety	- Restrict public access to the site through fencing and warning signage.- Implement traffic management measures to control vehicle movement and prevent accidents.- Avoid noise, dust, and vibration nuisances to nearby residents.- Conduct HIV/AIDS and communicable disease awareness and testing programs for workers and local communities.- Collaborate with local health facilities for prevention and outreach programs.
Community Interaction	- Workers engaging in gender violence, inappropriate relationships with minors, rape, or any form of sexual exploitation will face legal prosecution as per national laws.- Interaction with the community shall be guided by respect for local customs, leadership, and social structures.- Community leaders will have the authority to report to government authorities any contractor or worker misconduct that threatens community peace.- The contractor and all workers must settle any outstanding bills or obligations incurred within the community before final payment by the client.- The contractor must ensure that community members have free and open access to the project's Grievance Redress Mechanism (GRM).- The contractor is responsible for ensuring that these rules are communicated, understood, and followed by all workers.
Social Safeguards	- Respect local customs, norms, and community values.- Establish and maintain a functional Grievance Redress Mechanism (GRM).- Prohibit child labor, forced labor, GBV, and sexual exploitation or abuse.- Ensure gender equity in recruitment and treatment of workers.- Enforce a workers' Code of Conduct defining acceptable behavior and sanctions for violations.
Material and Resource Use	- Source materials from environmentally sound and approved suppliers.- Avoid extraction from ecologically sensitive or protected areas.- Use materials efficiently to minimize waste.- Implement water and energy conservation measures at the site.
Emergency Preparedness and Incident Reporting	- Develop and implement an Emergency Preparedness and Response Plan (EPRP) addressing fire, medical emergencies, and environmental hazards.- Provide firefighting and first aid equipment on site.- Maintain trained emergency response teams.- Record and report all emergencies and near misses promptly.- Review and update emergency plans regularly.

Rule Category	Requirements / Actions
Environmental and Social Monitoring	- Conduct regular inspections and audits of site environmental and social performance.- Keep records of all ESHS (Environmental, Social, Health, and Safety) activities, training, and incidents.- Submit monthly ESHS performance reports to the PIU and supervising consultant.- Facilitate access for monitoring and evaluation missions.
Compliance and Enforcement	- Compliance with these rules and the ESMP is mandatory.- Non-compliance may result in suspension of work, financial penalties, or contract termination.- The contractor must acknowledge these obligations as binding conditions of the contract.
Commitment to Abiding by the Rules	- All contractors shall distribute and explain these rules to their staff.- Every worker, regardless of rank or background, must sign a declaration of commitment to abide by these rules.- The signed copies shall be kept on file and made available for inspection by the client or supervising authority.- Commitment to these rules forms part of the contractor's contractual obligations.

Appendix 4: Code of Conduct for Contractors, Workers and Management

Section	Description
Purpose	This Code of Conduct aims to promote responsible behavior, integrity, safety, and respect among all personnel engaged in the construction of the Revenue Collection Offices. It establishes standards of conduct to prevent misconduct, protect communities, and uphold environmental and social safeguards. All contractors, subcontractors, consultants, and workers must read, understand, and sign this Code prior to engagement.
Commitment	The Contractor and all workers commit to maintaining the highest ethical standards, promoting a safe and respectful work environment, and complying with national labor laws, the project's Environmental and Social Management Plan (ESMP), and applicable international standards.
Compliance with Laws and Policies	- Comply with all relevant national laws, including labor, environmental, and occupational safety laws.- Follow all ESIA/ESMP provisions, client regulations, and site-specific management plans.- Report any legal or policy violations to the Site Supervisor or Environmental/Social Officer.
Professional Conduct	- Perform duties responsibly and with integrity.- Refrain from any form of corruption, theft, fraud, or misuse of project property.- Maintain punctuality and discipline while on duty.- Follow instructions from supervisors and respect the chain of command.
Health, Safety, and Environment (HSE)	- Always wear prescribed Personal Protective Equipment (PPE).- Attend all safety briefings and toolbox talks.- Report unsafe conditions, near misses, and accidents immediately.- Avoid actions that could endanger oneself, colleagues, or the public.- Keep the worksite clean and adhere to waste management protocols.
Respect for the Community	- Treat local residents and neighboring businesses with respect.- Avoid unnecessary noise, dust, and obstruction of public access.- Do not trespass on community property or disrupt livelihoods.- Respect local customs, traditions, and religious practices.
Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA), and Harassment Prevention	- Strictly prohibit any form of sexual exploitation, abuse, harassment, or gender-based violence.- No worker shall engage in sexual activity with anyone under the age of 18, regardless of consent.- Sexual favors in exchange for employment, money, goods, or services are forbidden.- Maintain professional boundaries at all times.- Any suspicion or incident must be reported immediately to the Site Manager, Social Safeguard Officer, or GRM focal point.- Violators will face immediate dismissal and referral to legal authorities.
Child and Forced Labor	- Employment of anyone below 18 years is strictly prohibited.- No worker shall be subjected to forced, bonded, or involuntary labor.- All recruitment must be based on free, informed, and voluntary consent.
Alcohol, Drugs, and Substance Abuse	- The use, possession, or distribution of alcohol or illegal drugs at the worksite is prohibited.- Workers must not report to work under

Section	Description
	the influence of drugs or alcohol.- Participation in HIV/AIDS awareness and voluntary testing programs is mandatory as part of health promotion efforts.
Non-Discrimination and Equal Opportunity	- Treat all colleagues equally regardless of gender, religion, ethnicity, disability, or social background.- Promote a culture of respect, inclusion, and teamwork.- Report any form of discrimination or harassment through established grievance channels.
Grievance Reporting and Confidentiality	- Workers and community members have the right to report grievances confidentially and without retaliation.- Use the project's Grievance Redress Mechanism (GRM) to raise any concern.- All reports will be handled confidentially and resolved promptly.
Environmental Responsibility	- Prevent pollution, minimize waste, and use materials efficiently.- Protect trees, vegetation, and natural resources near the construction site.- Dispose of hazardous materials according to approved procedures.- Report any environmental incident immediately.
Disciplinary Measures	Violations of this Code will result in disciplinary action, which may include:- Verbal or written warning.- Suspension or termination of employment.- Reporting to authorities for legal prosecution in cases of criminal behavior (e.g., GBV, theft, or assault).
Declaration of Commitment	I, the undersigned, have read and understood the contents of this Code of Conduct. I agree to abide by its provisions and understand that any violation may lead to disciplinary and/or legal action. **Name: _____** **Position: _____ Signature: _____ Date: _____**

Appendix 5: Emergency Preparedness and Response Plan (EPRP)

Introduction

This Emergency Preparedness and Response Plan (EPRP) outlines the procedures and systems to prevent, prepare for, and respond effectively to emergencies that may arise during the construction of the Revenue Collection Offices.

The Contractor shall prepare, implement, and maintain this EPRP in accordance with:

- The Environmental and Social Management Plan (ESMP) for the project.
- African Development Bank (AfDB) Environmental and Social Policy (2023) and Operational Safeguards (OS1–OS5).
- National occupational health, safety, and environmental regulations.
- Relevant local authority requirements and community safety protocols.

The EPRP shall be reviewed and approved by the Supervising Engineer, the Project Implementation Unit (PIU), and the AfDB Safeguards Team prior to commencement of construction activities.

1. Emergency Scenarios and Risk Assessment

The Contractor shall identify and analyze all potential emergencies that could occur during project implementation, including:

- Fire or explosion (from fuel, gas cylinders, or electrical faults).
- Structural collapse or scaffolding failure.
- Chemical or oil spills.
- Flooding or extreme weather events.
- Accidents involving vehicles or machinery.
- Outbreak of communicable diseases among workers.
- Security threats, including theft, vandalism, or civil unrest.

A **site-specific risk assessment** shall be undertaken for each scenario, detailing the likelihood, severity, and appropriate preventive and response measures.

2. Preventive Measures

Preventive strategies must be integrated into all construction activities to minimize the likelihood of emergencies. These include:

- Proper storage, labeling, and handling of flammable or hazardous materials.
- Routine maintenance of machinery, electrical systems, and lifting equipment.
- Implementation of dust suppression, waste segregation, and drainage management.
- Provision of firefighting and spill containment equipment.
- Controlled access to high-risk areas.
- Adequate site lighting, fencing, and hazard signage.

3. Emergency Response Procedures

The EPRP shall detail step-by-step procedures for responding to various emergencies, including:

- Immediate actions to contain, control, and mitigate impacts.
- Notification procedures for internal and external responders.
- Activation of alarms and communication channels.
- Safe evacuation routes and assembly areas.
- Rescue operations and medical response coordination.
- Emergency command structure and decision-making authority.

Evacuation maps and routes shall be displayed in all active work zones and camps.

4. Security Protocols

The Contractor shall prepare a **Site Security Plan** as part of the EPRP to address:

- Access control measures for personnel, visitors, and vehicles.
- Security surveillance and patrol arrangements.
- Coordination with local law enforcement.
- Procedures for handling violent protests, theft, or sabotage.
- Emergency lockdown and safe-shelter protocols when necessary.

5. Emergency Equipment and Infrastructure

The Contractor shall provide and maintain adequate emergency response infrastructure, including:

- Firefighting equipment (fire extinguishers, sand buckets, alarms).
- First aid kits, stretchers, and medical supplies.
- Spill containment and cleanup materials.
- Communication tools (two-way radios, sirens, alarms).
- Clearly demarcated **assembly/muster points** and evacuation routes.

All emergency equipment shall be inspected regularly and recorded in an Emergency Equipment Register.

6. Roles and Responsibilities

An Emergency Response Team (ERT) shall be established and trained to manage emergencies. The team shall include:

- Emergency Response Coordinator (ERC): Oversees all emergency operations and liaises with the PIU and AfDB where required.
- Safety Officers: Manage site evacuation and ensure compliance with safety procedures.
- First Aid Responders: Provide immediate medical assistance and coordinate with hospitals.
- Security Officers: Handle access control and coordination with law enforcement.

A clear chain of command and communication flow shall be defined in the plan.

7. Training and Drills

The Contractor shall conduct regular training and simulation exercises to ensure readiness. These include:

- Induction training for all staff and subcontractors on EPRP procedures.

- Quarterly emergency drills (fire, chemical spill, evacuation, or security).
- Post-drill evaluations to document lessons learned and corrective actions.
- Record keeping of all trainings and emergency exercises.

8. Communication and Notification Protocol

A clear communication system must be established to ensure rapid response and coordination:

- Internal alerts to site management and the Emergency Response Coordinator.
- External notification to fire services, police, hospitals, and local authorities.
- Use of loudspeakers, mobile phones, and two-way radios for quick dissemination.
- Notification of the AfDB Safeguards Officer and PIU within 24 hours of any major incident, as per AfDB's Emergency and Incident Notification Protocol.

A 24-hour emergency contact list shall be displayed prominently at all entry and work areas.

9. Coordination with External Agencies

The Contractor shall maintain formal coordination with:

- Local fire brigades, police, and ambulance services.
- Nearby hospitals or clinics for emergency care.
- Local government and disaster response agencies.
- Community leaders, to ensure awareness and cooperation during incidents.

Where necessary, the Contractor shall sign Memoranda of Understanding (MoUs) with response agencies to facilitate rapid assistance.

10. Post-Incident Recovery and Learning

After an emergency, the Contractor shall immediately:

- Secure the area and prevent further hazards.
- Conduct root cause analysis of the incident.
- Prepare and implement Corrective and Preventive Actions (CAPA).
- Provide medical treatment, counseling, or support to affected personnel.
- Submit a detailed Incident Report to the PIU and AfDB within 72 hours.

11. Documentation and Reporting

All emergencies, near misses, and drills must be recorded in an Emergency Incident Register, indicating:

- Nature, location, and date of the event.
- Actions taken and personnel involved.
- Outcomes and lessons learned.

Reports shall be shared periodically with the PIU, Supervising Engineer, and the AfDB Safeguards Unit.

12. Information Disclosure and Community Awareness

The Contractor shall promote transparency and preparedness through:

- Display of evacuation maps, assembly points, and emergency contacts.
- Awareness sessions and briefings for workers and surrounding communities.
- Translation of safety information into local languages where necessary.
- Collaboration with community leaders in emergency response and communication.

Appendix 7: Contractor Environmental and Social Policy Commitment

CONTRACTOR ENVIRONMENTAL AND SOCIAL POLICY COMMITMENT

At [Insert Company Name], we are fully committed to upholding and promoting the highest standards of environmental and social performance throughout the implementation of the Construction of Revenue Collection Offices Project. We acknowledge the potential environmental, health, safety, and social impacts associated with construction activities and commit to minimizing harm while maximizing positive outcomes for both people and the environment.

We hereby adopt the following Environmental and Social Policy Commitment:

1. **Regulatory Compliance**
   - We commit to full compliance with all applicable environmental, occupational health and safety, and social protection laws and regulations of the Federal Government of Somalia.
   - We shall also adhere to the African Development Bank (AfDB) Integrated Safeguards System (ISS) and all relevant international environmental and social standards.
   - All required environmental permits, licenses, and approvals will be obtained, maintained, and observed throughout the project period.

2. **Sustainable Resource Management**
   - We will ensure responsible and efficient use of natural resources — including water, raw materials, fuel, and energy — throughout the project lifecycle.
   - Our operations will promote environmental sustainability through resource conservation, energy efficiency, and the adoption of renewable energy technologies where feasible.

3. **Pollution Prevention and Control**
   - We will minimize emissions, noise, vibration, effluents, and dust from demolition and construction activities by implementing proven pollution control measures.
   - Waste reduction, segregation, and recycling will be prioritized.
   - All hazardous substances will be safely handled, transported, and disposed of in accordance with national and international best practices.

4. **Environmental Mitigation and Monitoring**
   - We commit to implementing all environmental and social mitigation measures outlined in the Environmental and Social Management Plan (ESMP).
   - Regular environmental and social performance monitoring will be conducted, and results will be reported to relevant authorities and the AfDB.
   - Corrective actions will be taken promptly in case of non-compliance or incident occurrence.

5. **Health, Safety, and Risk Management**
   - We are committed to a zero-harm workplace, ensuring the safety and well-being of all workers and surrounding communities.
   - All personnel will undergo safety training and be provided with appropriate Personal Protective Equipment (PPE).

- An Emergency Preparedness and Response Plan (EPRP) will be maintained and regularly tested to ensure readiness for any incident.

6. Social Responsibility and Stakeholder Engagement

- We respect the rights, dignity, and safety of all community members and will engage them transparently and respectfully throughout the project.
- A functional Grievance Redress Mechanism (GRM) will be established to receive, document, and address community concerns promptly.
- Construction operations will be managed to minimize disturbance, including noise, dust, and traffic impacts.

7. Gender, Child Protection, and Non-Discrimination

- We uphold zero tolerance for Gender-Based Violence (GBV), Violence Against Children (VAC), harassment, or discrimination of any kind.
- All workers will sign and adhere to the Contractor and Individual Codes of Conduct.
- We will promote inclusive and equitable employment opportunities for women, youth, and marginalized groups in line with national labor laws.

8. Capacity Building and Awareness

- Continuous training and capacity building will be provided on environmental and social safeguards, occupational health and safety, GBV/VAC prevention, and emergency response.
- Workers and subcontractors will be encouraged to act as champions of sustainability, safety, and ethical conduct on site.

9. Environmental Aesthetics and Site Management

- We will maintain a clean, orderly, and visually acceptable work environment.
- Construction waste, debris, and unused materials will be regularly cleared, and all project sites will be restored to acceptable conditions upon completion.

Commitment

This Policy Commitment reflects our company's dedication to sustainable and responsible construction practices that safeguard people, protect the environment, and promote social well-being.

Signed: _____
Name: _____
Title: _____
Date: _____
Company

Seal/Stamp: _____

Appendix 8: Environmental and Social Impacts Screening Checklist / Questionnaire

Project: Construction of Revenue Collection Offices

Purpose of the Checklist

This screening checklist is designed to identify and evaluate the potential environmental and social risks and impacts associated with the proposed construction and demolition works. The information will guide the classification of the project in accordance with the AfDB Integrated Safeguards System (ISS) and national environmental regulations and determine the level of environmental and social assessment required (e.g., ESIA, ESMP, or simplified checklist).

Each "Yes" response must be accompanied by a brief explanation or description of the expected impact and proposed mitigation.

Environmental and Social Screening Matrix

#	Category	Screening Question	Yes	No	Explanation / Comments
1	Socioeconomic / Cultural Heritage	Are there any cultural or heritage centers, religious sites, or community monuments near the proposed site?	☐	☐	
2	Socioeconomic / Cultural Heritage	Will the project affect any historical, cultural, or archaeological resources or sites of significance?	☐	☐	
3	Socioeconomic / Cultural Heritage	Could construction activities restrict access to cultural, social, or religious facilities?	☐	☐	
4	Air Quality	Are there sensitive receptors nearby (e.g., schools, hospitals, government offices, residences)?	☐	☐	
5	Air Quality	Will demolition and construction generate dust, fumes, or other air emissions that may affect workers or communities?	☐	☐	
6	Air Quality	Will air emissions (dust, exhaust, debris) exceed permissible limits or pose health risks?	☐	☐	
7	Gender and Vulnerable Groups	Are there activities that both men and women rely on near the project site that could be affected?	☐	☐	
8	Gender and Vulnerable Groups	Could the project create risks of Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA), or Violence Against Children (VAC)?	☐	☐	
9	Gender and Vulnerable Groups	Are vulnerable groups (women, youth, PWDs, elderly, IDPs) at risk of exclusion, harm, or reduced access to benefits?	☐	☐	
10	Land Use	Is the project located on publicly owned land?	☐	☐	
11	Land Use	Is there existing land use at the project site (e.g., market, offices, residential, or community services)?	☐	☐	
12	Land Use	Will the project result in temporary or permanent displacement of land users or businesses?	☐	☐	
13	Landscape and Visual Effects	Will existing structures be demolished, or will major terrain alteration occur?	☐	☐	

#	Category	Screening Question	Yes	No	Explanation / Comments
14	Landscape and Visual Effects	Will the project change the visual appearance of the surrounding environment?	☐	☐	
15	Landscape and Visual Effects	Will the works generate significant quantities of solid waste, debris, or excavated soil?	☐	☐	
16	Noise and Vibrations	Are there potential noise or vibration impacts from heavy machinery or demolition?	☐	☐	
17	Noise and Vibrations	Are there sensitive facilities (e.g., offices, schools, residences, courts) that may be affected by noise or vibration?	☐	☐	
18	Hazardous Materials	Will hazardous materials (e.g., asbestos, fuel, lubricants, chemicals) be handled, stored, or transported on-site?	☐	☐	
19	Markets and Livelihoods	Are there any nearby informal traders, kiosks, or market activities that could be disrupted?	☐	☐	
20	Markets and Livelihoods	Could the project cause temporary or permanent loss of livelihoods or access to income-generating areas?	☐	☐	
21	Markets and Livelihoods	Could access to essential public services or institutions be disrupted during works?	☐	☐	
22	Demographics and Social Risks	Will the project involve the influx of external workers into the local community?	☐	☐	
23	Demographics and Social Risks	Is there a risk of **child labor**, **forced labor**, or unsafe working conditions during construction?	☐	☐	
24	Demographics and Social Risks	Is there potential for social tension, conflict, or community resistance due to project activities?	☐	☐	
25	Community Health and Safety	Are there any potential health and safety hazards to the surrounding population (e.g., dust, debris, machinery movement)?	☐	☐	
26	Ecology and Soil Conservation	Will vegetation, trees, or green areas be cleared during construction?	☐	☐	
27	Ecology and Soil Conservation	Could soil erosion, contamination, or degradation occur as a result of excavation or waste disposal?	☐	☐	
28	Ecology and Soil Conservation	Is there a water body, drainage channel, or wetland near the site that could be affected?	☐	☐	
29	Fauna and Flora	Are there any bird species, small mammals, or other fauna inhabiting or breeding within the site?	☐	☐	
30	Fauna and Flora	Will project activities disturb existing flora and fauna habitats?	☐	☐	
31	Water Quality and Drainage	Could demolition or construction lead to contamination of surface or groundwater sources?	☐	☐	
32	Water Quality and Drainage	Will site runoff or wastewater affect drainage systems, local streams, or community water points?	☐	☐	
33	Water Quality and Drainage	Is there potential for stagnant water accumulation, breeding mosquitoes or other vectors?	☐	☐	

#	Category	Screening Question	Yes	No	Explanation / Comments
34	Utilities and Infrastructure	Could the project disrupt existing infrastructure such as electricity lines, fiber optic cables, water or sewerage pipes?	□	□	
35	Utilities and Infrastructure	Will worker camps, sanitation facilities, or service amenities be required on-site?	□	□	
36	Utilities and Infrastructure	Will there be a need for temporary or permanent relocation of existing public services or utilities?	□	□	

13. ANNEXES

Attached at the end of the report are the following:

1. Site Photos
2. Maps
3. Stakeholder Engagement Minutes

Ecotech is certified according to:

ISO 9001: 2015 Certificate No: KE002596 and

ISO 1400: 2015 Certificate No: 2112123SO